

# **EXHIBIT 3**

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Page 1

DR. LINDSEY CAMERON  
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

- - -

IN RE: UBER : Case No.  
TECHNOLOGIES, INC., : 3:23-md-03084-  
PASSENGER SEXUAL ASSAULT : CRB (LJC  
LITIGATION :  
:  
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:  
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- - -

REMOTE DEPOSITION OF  
DR. LINDSEY CAMERON

- - -

Taken remotely, via Zoom, on  
Wednesday, November 12th, 2025, beginning at  
2:13 p.m., before Beau Dillard, RPR, a Notary  
Public in and for the Commonwealth of  
Pennsylvania.

- - -

VERITEXT LEGAL SOLUTIONS  
MID-ATLANTIC REGION

- - -

Job No. CS7737764

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Page 2

1 DR. LINDSEY CAMERON

2 A P P E A R A N C E S :

3

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13

14

15

- - -

16

A L S O P R E S E N T : CHINYERE WOODS,

17 CONCIERGE

18 BEN PELTA-HELLER,

VIDEOGRAPHER

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- - -

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HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 3

1  
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DR. LINDSEY CAMERON		
I N D E X		
- - -		
EXAMINATION		PAGE
DR. LINDSEY CAMERON		
BY MR. WYATT		9
BY MS. POLLOCK		291
- - -		
E X H I B I T S		
- - -		
NUMBER	DESCRIPTION	PAGE
Exhibit 1	TAB 01 - 20251024	
	Cameron Rebuttal Report	11
Exhibit 2	TAB 02 - CameronInvoice	
	SimmonsFinal Amount26AUG25	18
Exhibit 3	TAB 03 - 20251105 Defendants	
	Notice of Deposition for	
	Dr Lindsey Cameron (MDL)	25
Exhibit 4	TAB 03A - LindseyCameronCV -	
	Statement CV 2	27

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 4

1		DR. LINDSEY CAMERON	
2	NUMBER	DESCRIPTION	PAGE
3	Exhibit 5	TAB 03B - 20251110 Responses	
4		and Objections to NOD of Cameron	
5			30
6			
7	Exhibit 6	Cameron Harvard Blitz 6APR	32
8			
9	Exhibit 7	TAB 05 - 2021 Testimony	59
10			
11	Exhibit 8	CameronInvoiceRetainer	84
12			
13	Exhibit 9	TAB 07 - L Cameron dissertation	
14			114
15			
16	Exhibit 10	TAB 13 - Algorithmic Management -	
17		Its Implications for Information	
18		Systems Research	142
19			
20	Exhibit 11	TAB 09 - Support for Social and	
21		Cultural Capital (2018)	
22		Kameswaran-Cameron-Dillahun	
23		(003)	156
24			
25			

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 5

1  
2  
3  
4  
5  
6  
7  
8  
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23  
24  
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DR. LINDSEY CAMERON		
NUMBER	DESCRIPTION	PAGE
Exhibit 12	TAB 10 - 20250926 Expert Report	
	Joseph Okpaku (MDL 23-03084)	162
Exhibit 13	TAB 17 -what-is-qualitative	
	-research -an-overview-	
	and-guidelines	184
	- - -	

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 6

DR. LINDSEY CAMERON

DEPOSITION SUPPORT INDEX

DIRECTION TO WITNESS NOT TO ANSWER

Page	Line
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None
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REQUEST FOR PRODUCTION OF DOCUMENTS

Page	Line	Description
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None		
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40	22	Materials Provided
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STIPULATIONS

Page	Line
------	------

7	1
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QUESTIONS MARKED

Page	Line
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None
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Page 7

1 DR. LINDSEY CAMERON

2 - - -

3 The attorneys participating in  
4 this deposition acknowledge that the  
5 court stenographer is not physically  
6 present in the deposition room and that  
7 he will be reporting this deposition  
8 remotely.

9 They further acknowledge that,  
10 in lieu of an oath administered in  
11 person, the oath will be administered  
12 remotely. The parties and their counsel  
13 consent to this arrangement and waive any  
14 objections to this manner of reporting.

15 The attorneys have indicated  
16 their agreement to the above stipulation  
17 off the stenographic record.

18 It is stipulated and agreed to  
19 by and between counsel for the respective  
20 parties that all objections, except as to  
21 form of the question, are reserved to the  
22 time of trial.

23 - - -  
24  
25



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Page 8

1 DR. LINDSEY CAMERON

2 - - -

3 THE VIDEOGRAPHER:

4 Good afternoon. We are going on  
5 the record at 2:13 p.m., on Wednesday,  
6 November 12th, 2025.

7 This is Media Unit Number 1 of  
8 the video-recorded deposition of  
9 Lindsey Cameron taken by counsel in the  
10 matter of In Re: Uber Rideshare cases  
11 filed in the United States District Court  
12 for the Northern District of California,  
13 San Francisco Division.

14 My name is Ben Pelta-Heller,  
15 representing Veritext, I'm the  
16 videographer. The court reporter is  
17 Beau Dillard from the firm Veritext.

18 Counsel and all present,  
19 including remotely, will now state their  
20 appearances and affiliations for the  
21 record, and will the reporter please  
22 swear in the witness.

23 MS. POLLOCK: Did we say counsel  
24 was entering their name?

25 Oh, I thought we weren't.

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Page 9

1 DR. LINDSEY CAMERON

2 This is Jo Anna Pollock from  
3 Simmons Hanly Conroy. Along with me  
4 today is Kirstina Berkover, and we are  
5 representing the Plaintiffs in the MDL.

6 MR. WYATT: And Geoffrey Wyatt  
7 from Kirkland & Ellis, with me is  
8 Katie O'Neill on behalf of Uber and the  
9 Uber Defendants.

10 - - -

11 DR. LINDSEY CAMERON, after  
12 having been first duly sworn, was  
13 examined and testified as follows:

14 - - -

15 EXAMINATION

16 - - -

17 BY MR. WYATT:

18 Q. Good afternoon.

19 A. Good afternoon.

20 Q. Could you please state your full  
21 name for the record?

22 A. Lindsey Denise Cameron.

23 Q. And is it okay if I refer to you  
24 as Dr. Cameron this afternoon?

25 A. That would be great.

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Page 10

1 DR. LINDSEY CAMERON

2 Q. And you understand you were  
3 sworn in, you're testifying under oath today,  
4 correct?

5 A. Yes.

6 Q. Okay. Let's see if I can figure  
7 out how to introduce an exhibit.

8 A. Can you give me one second?  
9 It's not letting me see you.

10 Q. Understood.

11 No problem.

12 MS. POLLOCK: Yeah.

13 That's up there.

14 THE WITNESS: Yeah.

15 But it's not big.

16 MS. POLLOCK: Yeah.

17 It's pinned on you.

18 THE WITNESS: I don't want that.

19 Is that not possible?

20 MR. WYATT: Can we go off the  
21 record for a minute?

22 I'm fine to sort this out.

23 THE VIDEOGRAPHER: Going off the  
24 video record. The time is 2:15 p.m.

25

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Page 11

1 DR. LINDSEY CAMERON

2 - - -

3 (Whereupon, a recess took place  
4 from 2:15 p.m. to 2:16 p.m.).

5 - - -

6 THE VIDEOGRAPHER: We are back  
7 on the video record.

8 The time is 2:16 p.m.

9 BY MR. WYATT:

10 Q. Welcome back.

11 I'm going to mark your report as  
12 Exhibit 1.

13 - - -

14 (Whereupon the document was  
15 marked, for identification purposes, as  
16 Exhibit Number 1.)

17 - - -

18 BY MR. WYATT:

19 Q. And that should be available to  
20 you in the share folder now. And I'll also put  
21 it on the screen.

22 A. I also have a written copy right  
23 in front of me.

24 Q. Okay. Same version that would  
25 have been served on October 24th, 2025?

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Page 12

1 DR. LINDSEY CAMERON

2 A. Yes. Same version.

3 Q. Okay. Great.

4 And if we scoot down to Page 60,  
5 is that your signature right there?

6 A. Yes.

7 Q. Okay. So this is your report,  
8 assuming this is the same PDF as the paper  
9 you've got there?

10 A. Yes, sir.

11 Q. It's Exhibit 1. Okay. Great.  
12 Do you believe, as of today,  
13 that the report is still accurate?

14 A. Yes.

15 Q. And are all the opinions that  
16 you plan to give at trial in this matter  
17 contained in your report?

18 A. There are some other, like,  
19 supplemental citations I may think to mention,  
20 but my opinion hasn't substantially change.

21 Q. Okay. And thanks for that.

22 Do you have any specific  
23 additional citations in mind or these are  
24 things that may occur as we work through  
25 things?

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Page 13

1 DR. LINDSEY CAMERON

2 A. I have two in mind and then  
3 there's some that might just occur.

4 Q. Okay. Do you want to share  
5 those two that you have in mind right now, and  
6 I can just take a note?

7 A. Right. One is by -- it's two  
8 authors. I'm forgetting the name of the first,  
9 the name of the second author is Johnston. I  
10 think it's 2019, 2020, and it's a critique of  
11 the Holland Kruger study in 2018 that  
12 Joseph Okpaku cited.

13 So in my rebuttal I mentioned  
14 that report, that that citation of  
15 Holland Kruger had been criticized by some  
16 academics, but I didn't mention actual  
17 academics who criticized it. So that site that  
18 I just mentioned, the Johnston one, is a  
19 critique of that.

20 And then the other report I was  
21 going to mention, I think it is Maffie 2023,  
22 British Journal of Industrial Relations, it  
23 talks about big data and theologizing source of  
24 corporate power, and there he makes the  
25 argument that Uber and researchers will have

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Page 14

1 DR. LINDSEY CAMERON  
2 the same data, you know, if Uber -- (inaudible)  
3 has a set of researchers, but they'll set  
4 different parameters and do different  
5 statistical tests which have been made  
6 different conclusions for their data.

7 So, they're -- I think they're  
8 points in the paper where I sort of talk about  
9 this without any additional citation, so those  
10 are the two additional citations I would have  
11 added to my report.

12 Q. And so, just to clarify, in the  
13 second citation, I understand how the first one  
14 fits in.

15 The second one, though, you're  
16 saying you make points in the report about how  
17 different researchers will interpret the same  
18 data in different ways and this report supports  
19 that or is it something else?

20 A. It's a different support -- it's  
21 a different point that it would support, and  
22 I'm not entirely sure where in the report I  
23 actually make this argument, but it's probably  
24 in something where I talk about how Uber uses  
25 data in a very selective fashion or has been

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Page 15

1 DR. LINDSEY CAMERON  
2 criticized about the way it uses its data, and  
3 I would have cited that -- that Maffie piece  
4 there.

5 So it could have -- it wouldn't  
6 exactly have gone with the rebuttal to Okpaku,  
7 but it's related to it. It's where --  
8 (inaudible) -- places I would have put that  
9 citation at.

10 Q. And what made you think of  
11 Maffie 2023, if anything?

12 A. Why?

13 I just -- I reread it recently,  
14 maybe about two weeks ago and realized it fit.  
15 I had seen the paper before, but I hadn't  
16 really thought about it deeply and then I was,  
17 like, oh, right, that would have been a good  
18 report -- a good paper to cite.

19 Q. Okay. And do you have any  
20 current plans to supplement your report or make  
21 any changes to it, before trial?

22 A. No.

23 Q. Okay. Beg your pardon?

24 A. I said, no, I don't currently  
25 have any plans.



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Page 16

1 DR. LINDSEY CAMERON

2 Q. Okay. And I know you've been  
3 deposed before.

4 Is that right?

5 A. Yes.

6 Q. And so you're familiar with how  
7 the process works -- and verbal answers, and  
8 yeses and noes rather than uh-uh and uh-huhs.

9 A. I'm going to do my best and try  
10 not to talk too fast for the court reporter.

11 Q. I'll make the same pledge  
12 because I have the same problem, and I will  
13 also pledge not to -- or try, I will pledge to  
14 try to not talk over you.

15 Sometimes I get excited,  
16 sometimes witnesses get excited, I won't be  
17 offended if you do it, please don't be offended  
18 if I do it, but to make the court reporter's  
19 job easier, let's try to give each other space  
20 between questions and answers.

21 A. Okay.

22 Q. And if -- if you answer a  
23 question, I'll assume that you understood the  
24 question that I asked.

25 Is that okay?

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Page 17

1 DR. LINDSEY CAMERON

2 A. That's fair.

3 Q. And, of course, therefore, if  
4 you don't understand a question or you have a  
5 question about the question, please raise that  
6 and I'll do my best to rephrase.

7 Is anything preventing you from  
8 giving truthful or accurate testimony today?

9 A. No.

10 Q. All right.

11 Breaks, if you need a break,  
12 just let me know. My only request is that if  
13 I've asked a question, that you give the answer  
14 before we take the break.

15 I generally go about an hour and  
16 then take breaks, but happy to go longer,  
17 shorter, whatever is necessary, just let me  
18 know.

19 A. Okay.

20 Q. Where are you physically located  
21 today?

22 A. Philadelphia.

23 Q. Okay. Is anybody there -- well,  
24 I know your counsel is there with you, is that  
25 right, Jo Anna Pollock?

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Page 18

1 DR. LINDSEY CAMERON

2 A. Correct.

3 Q. Is there anybody else in the  
4 room with the two of you?

5 A. No.

6 Q. And you mentioned you have your  
7 report printed out with you.

8 Are there any other materials  
9 with you, either printed out or at your  
10 fingertips on your computer there?

11 A. My laptop is in front of me.

12 Q. Okay. Do you have any materials  
13 pulled up on the laptop for use at today's  
14 deposition?

15 A. No.

16 Q. Okay. All right.

17 So let me do the next exhibit,  
18 give me a minute.

19 - - -

20 (Whereupon the document was  
21 marked, for identification purposes, as  
22 Exhibit Number 2.)

23 - - -

24 BY MR. WYATT:

25 Q. This will be Exhibit 2.

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Page 19

1 DR. LINDSEY CAMERON

2 I'll put this on screen. Okay.

3 Can you see what I marked as  
4 Exhibit 2 on the screen?

5 A. I can see it.

6 Q. And is this your invoice?

7 A. Yes.

8 Q. And it's dated, it looks like,  
9 August 26th, 2025.

10 Is that right?

11 A. Yes.

12 Q. Is this the only invoice you've  
13 sent to Plaintiffs so far for this case?

14 A. No. There was an invoice where  
15 I sent the retainer, so that's in that second  
16 line.

17 Q. I see, but is it all -- so that  
18 would have been a separate document or is  
19 this -- would it be a single document that  
20 reflects everything?

21 A. No. It would have been a second  
22 document. So I was paid \$7,500 before, and  
23 they --

24 Q. Okay.

25 A. -- when I sent the invoice.

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Page 20

1 DR. LINDSEY CAMERON

2 Q. Okay.

3 And do you intend to submit any  
4 additional invoices for your work on the report  
5 or any other work after August 26th?

6 A. Yes.

7 Q. Do you have an estimate as to  
8 the number of hours that would be reflected in  
9 that next invoice, as of this morning, before  
10 this deposition started?

11 A. No more than 20 hours.

12 Q. Okay. And just looking at the  
13 invoice here, it looks like it spans  
14 June 24th -- I'm sorry. Scratch that.

15 Looking at the invoice, it looks  
16 like it spans from June 18, 2024, through the  
17 22nd of August. And I assume that's, 2025.

18 Is that correct?

19 A. Correct.

20 Q. Okay. So 58.5 hours is the time  
21 you spent working from June 2024 through  
22 August 2025.

23 Is that accurate?

24 A. Yes.

25 Q. Okay.

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Page 21

1 DR. LINDSEY CAMERON

2 So were you retained in June of  
3 2024?

4 A. What exactly does retained mean?

5 Q. Were -- when were you hired by  
6 these Plaintiff's Counsel for this case?

7 A. I -- somewhere between May and  
8 June, because that was when the first invoice  
9 was sent.

10 Q. Okay. And somewhere between  
11 May and June of 2024, last year.

12 Is that correct?

13 A. Yes.

14 Q. Okay. And there's no time  
15 breakdown here. Do you have a sense of when  
16 these 58.5 hours billed here, were worked?

17 A. They were -- they were worked  
18 over that entire timeframe, from June 2024 to  
19 August 2025.

20 Q. Okay. So was it, like, sort of  
21 a gradual work process or were there certain  
22 months that were busier than others in that  
23 timeframe?

24 MS. POLLOCK: Object to form.

25 THE WITNESS: The summertime was

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Page 22

1 DR. LINDSEY CAMERON

2 busier -- the summer of 2025 was busier  
3 than previously.

4 BY MR. WYATT:

5 Q. Okay.

6 And what did that work consist  
7 of?

8 MS. POLLOCK: Object to form.

9 THE WITNESS: In summer 2025?

10 BY MR. WYATT:

11 Q. Yes.

12 A. I read a lot of documents. I  
13 met a lot with Jo Anna and people in her firm.  
14 I wrote a lot of text. I would say that's a  
15 lot that happened in the summer of 2025.

16 Q. Okay. And what about before  
17 summer of 2025? What would you work on during  
18 that period?

19 A. We did meetings.

20 I can't remember if I looked at  
21 any documents before summer of 2025. If I did,  
22 there weren't that many and the meetings were a  
23 mix of in-person and virtual.

24 Q. Okay. When you mentioned that  
25 you had read a lot of documents during the

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Page 23

1 DR. LINDSEY CAMERON

2 summer of 2025, what kind of documents were you  
3 talking about?

4 A. All the documents that are  
5 referenced in my report.

6 Q. And by documents, are you  
7 including documents produced in the litigation  
8 and literature or one or the other?

9 A. So I read literature all the  
10 time. I mean, I've studied Uber for almost ten  
11 years, so I'm always in the literature,  
12 thinking about the gig economy, so that doesn't  
13 have a time window.

14 So I would say the documents  
15 that I read a lot in the summer of 2025 were  
16 related to this case, specifically.

17 Q. Okay. And were the 58.5 hours  
18 listed here, inclusive of all the time you  
19 spent drafting your report in this case?

20 A. No.

21 Q. Okay. So some of the report  
22 work continued past August 22nd.

23 Is that correct?

24 A. Correct.

25 Q. Do you know how much was after



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Page 24

1 DR. LINDSEY CAMERON

2 August 22nd versus before?

3 A. Roughly 10 to 12.

4 Q. And what's the unit on 10 to 12?

5 A. Hours.

6 Q. Hours. Okay. Okay.

7 A. And -- but that's just writing  
8 the report. I mean, there's also a lot of this  
9 me being in the literature and constantly  
10 updating ideas that shape the report.

11 So I would say those 10 to 12  
12 hours is the actual -- maybe that's just  
13 writing, but the extra thinking that went into  
14 what you saw between 22 August and whenever  
15 this report was finished, was much greater than  
16 10 to 12 hours.

17 Q. Understood. That makes sense.

18 And your report is titled,

19 A Rebuttal to Mr. Okapaku's Report.

20 Is that right?

21 A. I'm looking for the title.

22 Yes. That's what it says.

23 Report -- well, it just says Rebuttal Report of  
24 Lindsey D. Cameron, Ph.D.

25 Q. Okay. That's fair.

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Page 25

1 DR. LINDSEY CAMERON

2 Mr. Okapaku's name is not on the  
3 title, but it's titled The Rebuttal Report.

4 Is that correct?

5 A. Exactly.

6 Q. Okay. And what prompted you to  
7 issue an invoice at the end of August?

8 MS. POLLOCK: Object to form.

9 THE WITNESS: My work on the  
10 case was paused.

11 BY MR. WYATT:

12 Q. Okay. Let me pull this down.

13 MR. WYATT: I'm going to  
14 introduce the notice of deposition as  
15 Exhibit 3. I'll share that as well.

16 - - -

17 (Whereupon the document was  
18 marked, for identification purposes, as  
19 Exhibit Number 3.)

20 - - -

21 BY MR. WYATT:

22 Q. Okay.

23 Can you see this on the screen?

24 A. Yes.

25 Q. And this is titled, "Notice of

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Page 26

1 DR. LINDSEY CAMERON

2 Remote Videotaped Deposition of Dr. Lindsey  
3 Cameron."

4 Do you see that?

5 A. Yes.

6 Q. Have you seen this document  
7 before today?

8 A. I think it was emailed to me.

9 I have -- let me --

10 MS. POLLOCK: Don't check your  
11 emails.

12 THE WITNESS: No. I'm not  
13 checking my emails. I'm scanning for the  
14 document.

15 BY MR. WYATT:

16 Q. If we scan to the fourth page,  
17 it's got a list of requests that you might have  
18 seen or focused on previously.

19 A. Yes. I have seen this before.

20 Q. Okay. And let me just start --  
21 I'm going to switch, actually, to the responses  
22 in this document, but we'll start here.

23 So if you look at  
24 Question Number 1, it says, "Your current and  
25 up-to-date resume or Curriculum Vitae, to the

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Page 27

1 DR. LINDSEY CAMERON  
2 extent the prior CV you produced in this action  
3 is no longer current and up-to-date."

4 Do you see that?

5 A. Yes.

6 MR. WYATT: And we'll mark this  
7 exhibit -- oops. I'm not doing it that  
8 way. Exhibit 4.

9 - - -

10 (Whereupon the document was  
11 marked, for identification purposes, as  
12 Exhibit Number 4.)

13 - - -

14 BY MR. WYATT:

15 Q. And in response to our notice of  
16 deposition and those requests, we -- we  
17 received this copy of your CV, which is  
18 20 pages long.

19 Is this a current CV for you?

20 A. It's been updated since then.

21 Q. Okay. And what's been added  
22 since then?

23 A. One of those papers was  
24 accepted. So if you scroll up, I can give you  
25 the number.

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Page 28

1 DR. LINDSEY CAMERON

2 Q. Sure.

3 A. Paper -- Paper 2.

4 Q. Is this Manuscripts Under Review  
5 or further up?

6 A. No. All the way up. Number 2.

7 Q. Oh, I see.

8 Number 2 under Peer-Reviewed  
9 Publications?

10 A. Yeah.

11 Q. Okay. And you're saying this  
12 has been -- subsequent to this CV then being  
13 produced, that was published or that was the  
14 change from the original CV that you attached  
15 to your report?

16 A. Oh, that paper was just  
17 accepted, I think, yesterday. So it's been --

18 Q. Okay.

19 A. Yeah. It's been updated on my  
20 website now.

21 Q. Okay. Great.

22 And do you know what difference,  
23 if any, there was between the CV that we  
24 received the other day and the one that would  
25 have been attached to your report at the end of

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Page 29

1 DR. LINDSEY CAMERON

2 October?

3 A. Oh, probably -- I don't think  
4 either Number 1 or Number 2 were accepted at  
5 the end of October.

6 And I also think there's one on  
7 number -- Number 20, might not have come back  
8 second-round review yet.

9 No. Number -- no -- number --  
10 do you see there's two number 20s, there's a  
11 typo?

12 Q. Oh, yeah. Uh-huh. Okay.

13 A. So the second Number 20, I don't  
14 think that had come -- oh. Okay. That had --  
15 that looks like that's updated. Okay then.

16 But on my website, my most  
17 up-to-date version of the CV is there all the  
18 time.

19 MS. POLLOCK: That's what this  
20 is.

21 THE WITNESS: Oh, then I have a  
22 typo? Then thank you for letting me  
23 know.

24 BY MR. WYATT:

25 Q. Happy to help.

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Page 30

1 DR. LINDSEY CAMERON

2 MS. POLLOCK: Just for  
3 everyone's benefit, I pulled this off of  
4 your website yesterday or two days ago,  
5 just so that everyone is on the same  
6 page.

7 MR. WYATT: Okay.

8 Appreciate that clarification.

9 All right.

10 So let me take that down.

11 BY MR. WYATT:

12 Q. And then I'll introduce this as  
13 Exhibit 5.

14 - - -

15 (Whereupon the document was  
16 marked, for identification purposes, as  
17 Exhibit Number 5.)

18 - - -

19 BY MR. WYATT:

20 Q. And can you see that on the  
21 screen?

22 A. Yes.

23 Q. Okay. And this one is called,  
24 "Plaintiff's Responses and Objections to  
25 Defendant's Notice of Remote Videotaped

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Page 31

1 DR. LINDSEY CAMERON

2 Deposition of Lindsey Cameron."

3 Have you seen this document  
4 before?

5 A. I'm not sure.

6 Q. Yeah. I'll represent to you  
7 that this is -- Plaintiff's take our notice and  
8 then they put responses to it and then this is  
9 what that document looks like, and I just have  
10 a couple questions.

11 I'll -- I'll further represent  
12 that it repeats the requests that are set forth  
13 in the notice that we just looked at, so rather  
14 than bouncing back and forth between the two  
15 documents, I'll just read off of this one and  
16 ask you some questions about it.

17 So we just looked at  
18 Request Number 1, just to illustrate what I was  
19 just talking about, your current and up-to-date  
20 resume or CV.

21 Do you see that right there?

22 A. Yes.

23 Q. And then the response is,  
24 "Documents were produced and since it's been  
25 updated, Plaintiff will produce," and we just



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Page 32

1 DR. LINDSEY CAMERON

2 looked at that, right?

3 A. Yes.

4 Q. Okay.

5 So moving on to

6 Request Number 2, which tracks, again, the  
7 Number 2 request from the notice, "A list of  
8 all articles, abstracts, studies, reports,  
9 seminar materials, and so on, authored or  
10 co-authored by You in the last ten years,  
11 including the name of the article, the name of  
12 the publication and the date it was published."

13 Do you see that?

14 A. Yes.

15 Q. And then in the response is,  
16 "Subject to objections, documents responsive to  
17 this request were previously produced. In  
18 addition, Plaintiff will produce one additional  
19 presentation not publically available."

20 Do you see that?

21 A. Yes.

22 Q. Okay. And then -- okay.

23 - - -

24 (Whereupon the document was  
25 marked, for identification purposes, as

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Page 33

1 DR. LINDSEY CAMERON

2 Exhibit Number 6.)

3 - - -

4 BY MR. WYATT:

5 Q. And then I just introduced -- it  
6 didn't let me stamp it, but I introduced what I  
7 received this morning as Exhibit 6, which I'll  
8 put on the screen.

9 A. I see it.

10 Q. Okay. Great.

11 And is this that document?

12 A. Yes.

13 Q. And it looks like it's a  
14 PowerPoint dated April 6th, 2017, entitled  
15 driver -- "Driving as Women's Work: Insights  
16 from Ridehailing Industry."

17 Is that right?

18 A. Yes.

19 Q. What can you tell us about this  
20 presentation?

21 MS. POLLOCK: Object to form.

22 THE WITNESS: So this -- this, I  
23 think, was mistakenly cited in my  
24 references, my work cited, but it's not  
25 actually used in my report to make an

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Page 34

1 DR. LINDSEY CAMERON  
2 argument, so it's just -- it's a typo,  
3 but because it was part of my references,  
4 Jo Anna asked me to give you a copy of  
5 the presentation, which I have now  
6 shared.

7 It's a conference on gender, so  
8 I was thinking about how can my research  
9 fit? And in it I talk about the  
10 different smells that are in an Uber car  
11 and how people have to police the smells  
12 to make sure they smell nice, and so I  
13 talk about odor work is a feminized form  
14 of work.

15 BY MR. WYATT:

16 Q. Okay. And so this is not  
17 something that you're relying on for your  
18 opinions in this case, it's just cited by  
19 accident, so in full disclosure you have  
20 provided it to us.

21 Is that a fair summary?

22 A. Yes. That's it exactly.

23 Q. Okay. So we'll put that away.

24 And then returning to our

25 Exhibit 5 here.

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Page 35

1 DR. LINDSEY CAMERON

2 Request Number 3 is, "A list of  
3 all cases, other than this one, in which You  
4 have, during the past four years, provided to  
5 the court or to counsel an expert disclosure or  
6 expert report, or in which You have given a  
7 deposition or testified in court."

8 Do you see that?

9 A. Yes.

10 Q. And there is a list of testimony  
11 provided in Exhibit C to your expert report,  
12 which is Exhibit 1 for this deposition.

13 Is that list still complete?

14 A. Yes.

15 Q. Okay. And we'll talk about that  
16 a little more in a minute.

17 Request Number 4 was, "To the  
18 extent not previously produced, all invoices,  
19 bills, billing records, time records and  
20 expense records connected with your involvement  
21 in the action."

22 Do you see that?

23 A. Yes.

24 Q. And we discussed the one invoice  
25 that's been produced so far already, right?

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Page 36

1 DR. LINDSEY CAMERON

2 A. No. There were two, because  
3 there would be the first one I sent for the  
4 retainer.

5 Q. Well, that's right. There are  
6 two, but we also looked at -- there's only been  
7 one produced to me and we discussed that one,  
8 correct?

9 A. Okay. Yes.  
10 We talked about the one you  
11 showed me.

12 Q. Okay. And are there any other  
13 time records or billing records that you have,  
14 that set forth more detail or different  
15 information than what's been produced so far?

16 A. I keep track of hours on, like,  
17 a little note pad and then I add them all up to  
18 put in the invoice.

19 Q. Okay.

20 A. But there's no -- there's  
21 nothing more than that, it's just one, two,  
22 three, you know, it's just numbers.

23 Q. Okay. And then Request Number 5  
24 says, "To the extent not previously produced,  
25 all consulting contracts or retention letters

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 37

1 DR. LINDSEY CAMERON  
2 concerning your involvement in this action  
3 between you and any other person or entity,  
4 including but not limited to the Plaintiff's  
5 lawyers and any other organization."

6 Do you see that?

7 A. Yes.

8 Q. And then it says, see response  
9 to Request Number 4 as the response.

10 Do you see that?

11 A. Yes.

12 Q. So we do not, as a part of the  
13 response to Number 4, receive any contracts or  
14 retention letters.

15 Do you have a contract or  
16 retention letter for this case?

17 A. I actually have no idea.

18 Q. Okay.

19 A. And --

20 Q. Go ahead.

21 MS. POLLOCK: Oh, I was -- I was  
22 just going to -- we filed objections and  
23 there's a stipulation on this point, I  
24 believe, in agreement amongst the Parties  
25 that we can talk about, but they haven't

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Page 38

1 DR. LINDSEY CAMERON

2 been produced for any of the experts.

3 MR. WYATT: Got it. Okay.

4 MS. POLLOCK: And I'm trying to  
5 find that additional invoice for you, but  
6 it slipped by me and I'm trying to track  
7 it down.

8 MR. WYATT: Okay. Great.

9 BY MR. WYATT:

10 Q. For Number 6, any final reports,  
11 final declarations, final outlines or other  
12 final writings. And it says, "subject to the  
13 foregoing objections, the documents responsive  
14 to this request have been previously produced."

15 Is that a reference to your  
16 report?

17 A. I don't understand the question.

18 Q. Is -- are there any other final  
19 reports that you have or other final documents,  
20 apart from your report?

21 A. No. This is the only finished  
22 product I have.

23 Q. Okay. And then, Number 7, "All  
24 documents, materials or things relied upon by  
25 You as the basis for Your opinions in this

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Page 39

1 DR. LINDSEY CAMERON

2 Action."

3 And the response is, "There are  
4 no responsive documents that are not already in  
5 Defendant's possession or otherwise equally  
6 accessible to it. The documents produced in  
7 this litigation that were considered or relied  
8 upon by expert in forming her opinions are  
9 cited in the report or attachments thereto.  
10 Other non-litigation documents listed in the  
11 report are publically available or already in  
12 Defendant's possession."

13 Do you see that?

14 A. Yes.

15 Q. And that -- is that referring to  
16 the footnotes and other citations in the body  
17 of your report and also Exhibit B, which is  
18 called Materials Considered?

19 A. That's what I believe that's  
20 referring to.

21 Q. Okay. And if -- if you relied  
22 on something and you -- you raised a couple of  
23 documents at the start, if you relied on  
24 something, would I expect to find it either  
25 cited in the report itself or in Attachment B



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Page 40

1 DR. LINDSEY CAMERON

2 or else among those two documents we started  
3 the deposition off with?

4 A. Yes. Though, I do want to say,  
5 I reviewed, I think, a few depositions that I  
6 didn't have a chance to look at thoroughly, so  
7 I don't think we included that.

8 I don't think it's included as  
9 materials I considered in this report.

10 Q. Okay.

11 A. And I -- honestly believe it  
12 shaped my opinion, because I can't even  
13 remember who the individuals were.

14 Q. That anticipates my next  
15 question. So you can't remember any names of  
16 the depositions you reviewed?

17 A. If I told you they were  
18 employees of Uber, that wouldn't be very  
19 helpful, right?

20 Q. I mean, it would narrow it down  
21 slightly, but only slightly.

22 MR. WYATT: Counsel, can you  
23 provide us a list of materials you  
24 provided the Witness that she considered  
25 or skimmed, whatever --

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Page 41

1 DR. LINDSEY CAMERON

2 MS. POLLOCK: Yeah.

3 That's a distinction, skimmed

4 versus actually considered, and so

5 I'll -- I'll follow up with you on it.

6 MR. WYATT: Yeah.

7 MS. POLLOCK: I'll track them

8 down and see what it's about.

9 MR. WYATT: Okay.

10 BY MR. WYATT:

11 Q. Give me a minute here. Sorry.

12 Get back on track.

13 Number 8 says, "All documents,  
14 materials, notes, transcriptions, audio  
15 recordings, survey responses, financial diaries  
16 and analyses related to Your "in-depth  
17 semi-structured interviews" conducted while  
18 researching drivers on ridesharing platforms  
19 including, but not limited to those related to  
20 Your training and work as a ride-hailing driver  
21 in the Washington, D.C. metro area, that form  
22 the basis for your opinions on algorithmic  
23 management and control."

24 Do you see that?

25 A. Yes.

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Page 42

1 DR. LINDSEY CAMERON

2 Q. Then the response was,  
3 "Plaintiff also specifically objects to this  
4 request on the grounds that it seeks  
5 information protected from disclosure,  
6 including by the Institutional Review Board."

7 Do you see that?

8 A. Yes.

9 Q. We'll talk a little more about  
10 this in your report.

11 Do you rely, in your report, on  
12 the semi-structured interviews and other  
13 conversations you had with drivers, as part of  
14 your research, in formulating your opinions?

15 MS. POLLOCK: Object to form.

16 THE WITNESS: Not exactly.

17 I rely on my knowledge of being  
18 an expert in all the published research I  
19 have on this.

20 So, there's -- it forms my  
21 general knowledge in the same way that,  
22 like, I've read thousands of articles or  
23 hundreds of articles about the gig  
24 economy and it shapes my knowledge.

25 Do I actually go to a specific

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Page 43

1 DR. LINDSEY CAMERON  
2 interview or transcript when writing this  
3 report? Not at all.

4 BY MR. WYATT:

5 Q. Okay. The response references  
6 the Institutional Review Board.

7 What does the Institutional  
8 Review Board do that prevents production of  
9 this type of material?

10 MS. POLLOCK: Object to form.

11 THE WITNESS: So from what my  
12 understanding is, the IRB is to protect  
13 the rights of research subjects.

14 And it was created after the  
15 Tuskegee experiment, and we know the  
16 whole history around that.

17 And so there's a confidentiality  
18 waiver that all of my participants in my  
19 study sign where I don't collect their  
20 names, or I -- I delete any sort of  
21 identifying data about them once the  
22 research process is complete.

23 And that data is never shared  
24 with anyone, besides me. So even if  
25 these papers go through peer-review, the

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Page 44

1 DR. LINDSEY CAMERON  
2 actual raw data is never shared with  
3 anyone, that's always been protected.

4 And that's the -- you know,  
5 my -- all of my studies have to be  
6 approved by Institutional Review Board.  
7 This is sort of common norms in the  
8 sciences.

9 BY MR. WYATT:

10 Q. And so, I'm just trying to  
11 understand how the IRB prevents you from  
12 sharing materials -- well, let me scratch that.

13 You mentioned that the intake  
14 doesn't use drivers' names. So are the  
15 materials that exist already deidentified?

16 A. No. They're identified, because  
17 they are -- because they're in my control, but  
18 everything that I publish in deidentified.

19 And there are a lot of different  
20 security protocols I had around my collecting  
21 the data and trying to keep it safe, because  
22 Uber does have a pattern of history of  
23 targeting individuals, drivers and other people  
24 who speak out against it.

25 So it's one of the reasons about

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Page 45

1 DR. LINDSEY CAMERON

2 why I was -- I'm very -- I was very protective  
3 about the data and I have multiple safeguards  
4 in place.

5 Q. Okay.

6 MR. WYATT: I object to that  
7 characterization, but -- just for the  
8 record.

9 BY MR. WYATT:

10 Q. Does -- would it be possible to  
11 deidentify the information and produce the  
12 deidentified versions of these materials?

13 MS. POLLOCK: Object to form.

14 THE WITNESS: The deidentified  
15 pieces of data are in my published  
16 research.

17 BY MR. WYATT:

18 Q. Well, in their complete form?

19 A. No.

20 MS. POLLOCK: Object to form.

21 THE WITNESS: So there's not an  
22 entire interview transcript in any of my  
23 data -- in any of my papers because  
24 that's not how -- that's not how  
25 researchers determine whether or not a

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 46

1 DR. LINDSEY CAMERON

2 piece of research is valid or  
3 generalizable or rigorous.

4 BY MR. WYATT:

5 Q. Right. You're not -- you're not  
6 giving to the peer-reviewers, I understand,  
7 like, your whole set of interview transcripts.

8 That's what you're saying,  
9 correct?

10 A. Correct.

11 Q. Okay. But I'm trying to get  
12 down to the bottom of this language about the  
13 information is protected from disclosure,  
14 including by Institutional Review Board, so let  
15 me ask the question this way.

16 Is there anything other than the  
17 Institutional Review Board that prevents  
18 disclosure of these materials?

19 MS. POLLOCK: Object to form.

20 THE WITNESS: I'm not sure.

21 BY MR. WYATT:

22 Q. Okay. And then, is there a  
23 written policy or is there some sort of  
24 document you have from the Institutional Review  
25 Board that says you cannot share these

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Page 47

1 DR. LINDSEY CAMERON

2 materials?

3 A. Oh, yes.

4 Q. And -- and what is  
5 that document?

6 MS. POLLOCK: Object to form.

7 THE WITNESS: I mean, any time  
8 that a -- I would like to do a research  
9 study, you have to submit a petition  
10 to -- or application with your research  
11 protocols to the Institutional Review  
12 Board.

13 It gets reviewed by a committee  
14 who has certain guidelines about how you  
15 protect human subjects, so they aren't  
16 exploited or hurt or harmed at some point  
17 in the research process.

18 And so there's all this  
19 documentation that happened around each  
20 -- (inaudible) -- to get their approval.

21 And, you know, when you ask, is  
22 there anyone besides the IRB that's  
23 preventing this, the only reason people  
24 participate in research studies in  
25 general, and in mine, because I promised



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Page 48

1 DR. LINDSEY CAMERON

2 them confidentiality.

3 BY MR. WYATT:

4 Q. And would it threaten their  
5 confidentiality if deidentified versions of the  
6 materials were produced?

7 MS. POLLOCK: Object to form.

8 THE WITNESS: That's a very  
9 broad question. By deidentifying data,  
10 do you -- you know, there's one way you  
11 can think about it.

12 If I have three lines of an  
13 interview, is that appropriately  
14 deidentified? It could be. You know, I  
15 do feel like most of my data in my  
16 research studies are deidentified.

17 If I gave anybody a transcript,  
18 there's no way that could be  
19 deidentified.

20 BY MR. WYATT:

21 Q. And why is that, the transcript  
22 could be?

23 MS. POLLOCK: Object to form.

24 THE WITNESS: I mean, there's  
25 one about -- I mean, there's just --

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 49

1 DR. LINDSEY CAMERON

2 there's so many different reasons, so  
3 I'll just try to give you a few.

4 One is by you could be listening  
5 to someone's voice and that would be a  
6 way to identify them. They could drop  
7 identifying details in the transcript  
8 about where they work or who they talked  
9 to or a specific incident they had.

10 So there's a lot of --  
11 there's -- that is one of the reasons why  
12 we don't -- you know, we have to protect  
13 our subjects in doing this type of  
14 research.

15 BY MR. WYATT:

16 Q. Okay. And then, just referring  
17 back to the process you described about getting  
18 permission from the -- the Institutional Review  
19 Board, would there be, like, project or  
20 article-specific documents from an IRB that you  
21 would have that says, in essence, thou shall  
22 not share information about these individuals?

23 MS. POLLOCK: Object to form.

24 THE WITNESS: Yeah.

25 I'm pretty sure that's in the

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Page 50

1 DR. LINDSEY CAMERON

2 IRB, in the agreement that I signed with  
3 the University.

4 BY MR. WYATT:

5 Q. Okay. So it's in the agreement.  
6 It's not -- well, let me scratch that.

7 It's not in a broad IRB policy  
8 statement, it would be specific to the projects  
9 you're discussing.

10 Is that correct?

11 A. Exactly. Yeah.

12 Each project goes through it's  
13 own Institutional Review Board.

14 Q. Okay. Okay. Let me see.

15 And then Number 9 is, "All  
16 interviews and statements taken by you or at  
17 your direction, concerning this action,  
18 including notes -- any notes, transcriptions,  
19 video and/or audio recordings associated with  
20 such."

21 Do you see that?

22 A. Yes.

23 Q. And then the response refers us  
24 to 7 and 8.

25 Well, let me ask a clarifying

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Page 51

1 DR. LINDSEY CAMERON

2 question because that doesn't make a lot of  
3 sense to me.

4 Did you take any interviews or  
5 statements by you, concerning this action?

6 A. No.

7 Q. Okay. So there's -- there's  
8 just nothing responsive to Request Number 9?

9 A. Seems that way.

10 Q. Okay. That was my assumption,  
11 based on reading your report, but I -- since  
12 there were no citations to anything like that  
13 in there, but I just wanted to make sure I was  
14 understanding it correctly.

15 Okay. So for Number 10,  
16 "Materials and documents provided to you or  
17 received by you in connection with the action"  
18 and it says, "Refer to Number 7", which I  
19 assume is a reference to your materials  
20 considered list, and we talked about that  
21 already, right?

22 A. Right. The only thing -- I -- I  
23 mean, just to be super clear, I received a  
24 bunch of depositions -- I get all my documents  
25 in hard copy.

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Page 52

1 DR. LINDSEY CAMERON

2 Q. Okay.

3 A. So I do have a whole box of  
4 depositions that I mentioned before, I skimmed  
5 a few of them. I don't really remember  
6 anything about them, so I just want to say they  
7 were provided to me, but I didn't actually read  
8 or review them.

9 Q. And how did you decide what  
10 materials you needed from the litigation, in  
11 order to develop your opinions in this case?

12 A. That is a long back and forth  
13 process in which I had conversation with  
14 Jo Anna and her team about what I would be  
15 interested in, what they thought they had, and  
16 sort of, like, we compiled this list and I  
17 received the materials.

18 And then as I was starting to go  
19 through things on my own, I prioritized what I  
20 thought would be most important.

21 Q. Okay. Request Number 1, "All  
22 notes, calculations, memoranda, drawings,  
23 models, illustrations, diagrams, recordings or  
24 records generated or utilized by you", refers  
25 us back to Number 7.

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Page 53

1 DR. LINDSEY CAMERON

2 I assume there's nothing in this  
3 category that you have not produced to us?

4 A. I mean, I have little scattered  
5 pieces of notes on pieces of paper around, but  
6 nothing is not -- that's not in my report.

7 Q. Okay. So there's no sort of  
8 separate exhibit or presentation or something  
9 that you put together that would be part of  
10 your opinions in this case, that you've not  
11 produced as part of your report, at least so  
12 far?

13 A. No. Not at all.

14 Q. Okay. And then Number 12, "To  
15 the extent not produced already, all other  
16 information, documents, studies, texts,  
17 treatises, objects or anything else that you  
18 will use at trial."

19 Is there anything that you plan  
20 to use at trial that is not contained in your  
21 report that you know of right now?

22 A. No.

23 Not that I know of right now.

24 Q. Okay.

25 A. But because I'm in the

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Page 54

1 DR. LINDSEY CAMERON  
2 literature, I might be thinking about something  
3 else, like those reports I had mentioned to you  
4 earlier.

5 Q. Okay.

6 MS. POLLOCK: And Geoffrey, just  
7 to round that out, I sent you by email  
8 that invoice from 2024, it's in your  
9 email inbox.

10 MR. WYATT: Okay. Great.

11 MS. POLLOCK: It's just a super  
12 simple document, if you want to mark it  
13 or not.

14 MR. WYATT: Yeah. I'll do that  
15 after the next break.

16 MS. POLLOCK: Sure.

17 BY MR. WYATT:

18 Q. Okay. So shifting gears  
19 slightly, who retained you in this case?

20 A. Can I say Jo Anna?

21 Q. Totally acceptable answer. Yes.

22 A. I think her firm is called  
23 Simmons and something.

24 Q. Okay. And I think we talked  
25 about this earlier, but you were retained in

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Page 55

1 DR. LINDSEY CAMERON

2 roughly May or June of 2024.

3 Is that right?

4 A. That sounds right. Yes.

5 Q. Okay. And then you worked with  
6 this firm or Jo Anna Pollock previously?

7 A. No.

8 Q. You have, though, testified in  
9 other cases and other situations, involving  
10 Uber.

11 Is that right?

12 A. Yes.

13 Q. Okay. And if we go back to  
14 Exhibit 1, which is your report. I think we're  
15 all the way to the end.

16 This is your list of prior  
17 testimony. We talked about it briefly a minute  
18 ago, right?

19 A. Yes.

20 Q. And -- and this is complete as  
21 of now as to prior testimony or other cases in  
22 which you were involved as an expert?

23 A. Correct.

24 Q. And does this cover every case  
25 in which you've been retained as an expert or



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Page 56

1 DR. LINDSEY CAMERON

2 only ones in which you testified, or is that  
3 the same universe of cases?

4 A. Only cases in which I've  
5 testified.

6 Q. Okay. So are there other cases  
7 in which you've been retained as an expert  
8 witness, but have not been deposed or otherwise  
9 testified?

10 MS. POLLOCK: You can answer the  
11 question yes or no.

12 So as to protect any retention  
13 by you, in terms of in a consulting --

14 THE WITNESS: So if I understand  
15 the question, retain includes consulting  
16 as well?

17 BY MR. WYATT:

18 Q. Yes. And Counsel is right, I'm  
19 only asking yes or no, not for any details,  
20 just have you had any other arrangements as a  
21 consulting expert, outside of testifying?

22 A. Yes.

23 Q. Okay. And are there any of  
24 those that you are free to discuss or are they  
25 all subject to confidentiality?

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 57

1 DR. LINDSEY CAMERON

2 A. Subject to confidentiality.

3 Q. Okay. Let's talk about the  
4 first item on the list, which is testimony  
5 provided for a hearing held by the  
6 Pennsylvania State Senate Democratic Policy  
7 Committee, 2019.

8 Do you see that?

9 A. Yes.

10 Q. And do you recall what the  
11 nature of the hearing was in 2019?

12 A. No. But the testimony is on my  
13 website.

14 Q. Okay.

15 That's true for 2019 and 2021?

16 A. Yes. I think they're both on my  
17 website.

18 Q. Okay. Do you recall whether the  
19 2019 testimony was the -- on the same issues as  
20 2021 or different issues, or you don't --

21 A. I think they were pretty close,  
22 pretty similar.

23 Q. Okay. And were you retained to  
24 provide that testimony?

25 A. What does retained mean?

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 58

1 DR. LINDSEY CAMERON

2 Q. Hired, paid?

3 A. No. I was not hired or paid.

4 Q. So how did it come to be that  
5 you were appearing at these hearings?

6 A. I think a colleague recommended  
7 me for 2019. And then I think in 2021, they  
8 just asked me to come back.

9 Q. Okay.

10 A. They, being the State Senate.

11 Q. Okay. Got it.

12 And were you testifying as an  
13 expert at these hearings?

14 A. I don't know what -- I don't  
15 think I quite understand the question.

16 Q. Yeah. I don't mean it in a  
17 technical sense, but was your expertise being  
18 sought at these hearings?

19 Was that the reason for your  
20 testimony?

21 A. I was -- yes, I was talking  
22 about the research in the ride-hailing  
23 industry.

24 Q. Okay. Looking at the second  
25 item, that's the 2021 testimony at the same

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Page 59

1 DR. LINDSEY CAMERON

2 committee, correct?

3 A. Yes.

4 MR. WYATT: And let me introduce  
5 another exhibit here.

6 - - -

7 (Whereupon the document was  
8 marked, for identification purposes, as  
9 Exhibit Number 7.)

10 - - -

11 MR. WYATT: This will be  
12 Exhibit 7.

13 BY MR. WYATT:

14 Q. And it should be up on the  
15 screen now.

16 Do you see that?

17 A. Yes.

18 Q. Okay. I think this is your 2021  
19 testimony.

20 Are you able to determine that  
21 by looking at it?

22 A. Yes.

23 It looks -- it looks like it.

24 Q. And I found this -- it sounds  
25 like you have it on your website too. We found

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Page 60

1 DR. LINDSEY CAMERON

2 this on Senator Nikil Saval's website.

3 A. Yes.

4 Q. Is that somebody you know from  
5 these hearings or remember from these hearings?

6 A. That name sounds familiar.

7 Q. Okay.

8 A. And I think on my website, I  
9 might even link to his -- I might link to this  
10 document, on Nikil's website.

11 Q. Okay. And then at the bottom  
12 here on Page 1, help me understand how  
13 testimony works in this committee.

14 Would you have submitted this  
15 written testimony and also appeared live to say  
16 essentially the same thing or is it different  
17 from that?

18 A. From what I remember, I do not  
19 remember if I shared a written product. No.  
20 Maybe I did, if it's on Nikil's website, but I  
21 just remember -- I remember going up and  
22 reading this.

23 Q. Okay. And so, last paragraph on  
24 the first page, it says, "Out of the 13 percent  
25 of the workforce that are in independent

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 61

1 DR. LINDSEY CAMERON

2 contractor work arrangements, only one percent  
3 are working gig jobs with most of them being  
4 ride-hailing drivers."

5 Do you see that?

6 A. Correct.

7 Q. So at this point in time, you're  
8 transcribing ride-hailing drivers as  
9 independent contractors, correct?

10 MS. POLLOCK: Object to form.

11 THE WITNESS: No.

12 BY MR. WYATT:

13 Q. What's wrong about that?

14 A. What I think -- so I say  
15 independent contractor work arrangements, so  
16 that's when individuals are not employees.

17 But I would want to say that the  
18 way we use these words in our management  
19 literature are different then I think from a  
20 legal term of how you think about Uber  
21 classification.

22 So I wouldn't -- I'm not making  
23 an argument that I think these workers are  
24 independent contractors nor am I making an  
25 argument that I think these workers are

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 62

1 DR. LINDSEY CAMERON  
2 employees, I'm just stating the facts that this  
3 moment, that these are the work arrangements  
4 that they're in.

5 Q. Okay. That's understood.

6 And so what are some of the  
7 differences between the literature you just  
8 described and the legal definitions of terms  
9 like this?

10 MS. POLLOCK: Object to form.  
11 And calls for a legal conclusion.

12 THE WITNESS: To be honest,  
13 that's outside of my realm of expertise.

14 BY MR. WYATT:

15 Q. Okay. But I think -- I'm  
16 following up on a statement you just made.

17 You have a sense, though, that  
18 there's a difference in meaning.

19 Is that a fair --

20 A. Yes. I do believe there's a  
21 deep difference -- there's -- there's  
22 differences in meaning in how we think about  
23 these terms, how we think about control, just  
24 because we're two different disciplines.

25 Q. Okay.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 63

1 DR. LINDSEY CAMERON

2 And we'll get into some of those  
3 differences too as we go along here, but that's  
4 helpful framing for going forward.

5 And then, if we can scroll -- or  
6 I'm scrolling, so I'll scroll to Page 2, you  
7 have a section called "What Control Looks Like  
8 in Gig Work."

9 Do you see that?

10 A. Yes.

11 Q. And then it says, "In my  
12 research, I identify five ways algorithms  
13 control the work process."

14 Is that right?

15 A. Correct.

16 Q. And what do you mean by control,  
17 as you use it here?

18 A. You know, I -- I was thinking  
19 the same thing. I don't think that's the right  
20 word. I would use the word manage.

21 Q. Okay.

22 A. And so this is before my papers  
23 had been published and peer-reviewed, and I'm  
24 pretty clear -- I'm pretty sure that I use the  
25 word manage instead of the word control right



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 64

1 DR. LINDSEY CAMERON

2 there.

3 Q. Okay. And what would you mean  
4 by manage, if you replaced control with manage?

5 A. So a manage would be those five  
6 dimensions I'm talking about, you know, how did  
7 they manage or direct a labor process? And  
8 they deal with the matching, in giving  
9 instructions and setting prices.

10 And so my 2024 Administrative  
11 Science Quarterly Article lays that out, like,  
12 what is algorithmic management?

13 Q. And when we use the words  
14 control or manage in this sentence, is there --  
15 is that word phrased with either a negative or  
16 positive connotation or is it neutral?

17 MS. POLLOCK: Object to form.

18 THE WITNESS: So I -- I don't  
19 think we can use the word manage and  
20 control interchangeably, but it is  
21 neutral.

22 I would agree with you it's  
23 neutral. You weren't saying it was  
24 neutral, but I would say, yes, it is  
25 neutral.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 65

1 DR. LINDSEY CAMERON

2 BY MR. WYATT:

3 Q. Is it descriptive? Is that a  
4 good way to think about it rather than  
5 pre-scripted or normative?

6 MS. POLLOCK: Object to form.

7 THE WITNESS: We don't use those  
8 words in my field, so I don't think I can  
9 answer that.

10 BY MR. WYATT:

11 Q. Okay. Fair enough.  
12 I'm just trying to understand  
13 it, but I think I do, based on your last  
14 answer.

15 You also mention in the same  
16 paragraph that "Photo verification compliance  
17 with company guidelines, such as making sure  
18 the person registered with the platform is the  
19 one driving and that drivers wear masks."

20 I assume this latter part is the  
21 reference to the COVID era?

22 A. Yes. Exactly. It's 2021.

23 Q. And so -- and you note that, and  
24 "I'm sure many of you are familiar with these  
25 systems are inherently racially biased."

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 66

1 DR. LINDSEY CAMERON

2 Is that referring to photo  
3 verification systems?

4 A. Photo verification, but also  
5 algorithmic management systems in general are  
6 racially biased, but I believe when you're  
7 looking at that -- well, you see that in that  
8 question, it says algorithms -- okay.

9 "Algorithms have a harder time  
10 detecting the features of darker-skinned  
11 people." So I would say algorithmic management  
12 is racially biased. Photo verification, I  
13 would say is a subset within algorithmic  
14 management.

15 Q. Okay. And you go on to say:  
16 "Even in situations where control is not  
17 actually exercised, i.e., there is only the  
18 threat of a penalty of workers do not behave  
19 accordingly, there is still control because  
20 workers align their behaviors to the management  
21 system."

22 Do you see that?

23 A. Correct.

24 That isn't properly worded.

25 Q. What's wrong with it?

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Page 67

1 DR. LINDSEY CAMERON

2 A. The -- the beginning, where I  
3 say "Even in situations where control is not  
4 actually exercised", that word should be  
5 sanctioned.

6 Like, even when they're not  
7 actual punishments, control is still being  
8 exercised. That's -- that's the key idea of  
9 that sentence.

10 Q. Okay. And how is that?

11 How is control operating, even  
12 if they're not actually being sanctioned?

13 A. So you see what I have in  
14 between the M line, the i.e.?

15 Q. Yeah.

16 A. There's only the threat of  
17 penalty if workers do not behave accordingly,  
18 there is still control because that threat of  
19 penalty aligns individuals' behavior to  
20 management systems.

21 And that's not just my research,  
22 you know, that's Fuoco 77, that's Antibe and  
23 Chan 2008, there's a lot of -- it's also  
24 Antibe 2006, that's the -- you don't just need  
25 punishment to be able to actually -- to have

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 68

1 DR. LINDSEY CAMERON

2 organizational control is what that statement  
3 is saying.

4 Q. Do you think photo verification  
5 serves an important safety service?

6 MS. POLLOCK: Object to form.

7 THE WITNESS: It possibly could.  
8 My expertise isn't safety.

9 BY MR. WYATT:

10 Q. Do you think there are ways to  
11 obtain the safety result that photo  
12 verification attempted to secure without  
13 exerting some form of control?

14 MS. POLLOCK: Object to form.

15 THE WITNESS: Can you say that  
16 one more time?

17 BY MR. WYATT:

18 Q. It was a poorly worded question.  
19 I was making it up as I went along.

20 Let me try again.

21 Is there a way to verify that a  
22 driver is who the driver claims to be, without  
23 exerting some form of control?

24 MS. POLLOCK: Object to form.

25 THE WITNESS: I'm not sure that

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 69

1 DR. LINDSEY CAMERON

2 I can really answer this question,  
3 because, one -- the first part is, can  
4 you verify the driver is who they really  
5 are?

6 Like, that's out -- that's  
7 outside of my scope of expertise, to talk  
8 about -- to understand photo  
9 verification.

10 I also feel like in the way you  
11 phrased that question, there was a  
12 miss -- we have a different  
13 conceptualization of what is control.

14 Like, control, to me, is not yes  
15 or no, it's not binary, it's like an  
16 enactment of a larger organizational  
17 system.

18 BY MR. WYATT:

19 Q. I think you're right and I think  
20 that's -- I'm actually asking the question to  
21 try to flush out your definition of control and  
22 that -- that explanation is helpful to my  
23 understanding.

24 So let me ask you some other  
25 questions like that, but I understand your

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 70

1 DR. LINDSEY CAMERON

2 answer, so I'll move on.

3 And then, let's see -- on the  
4 next page, we have a section called  
5 "Consequences of Gig Work For Customers,  
6 Workers and Community."

7 Do you see that?

8 A. Yes.

9 Q. And then, in Number 2, you  
10 write, "Now, I'll share some of the research  
11 about the benefits and drawbacks of gig work  
12 for customers, workers and society more  
13 generally", right?

14 A. Yes.

15 Q. And is that your -- is that --  
16 does that continue to be your view that there  
17 are benefits and drawback of gig work for  
18 customers, workers and societies more  
19 generally?

20 A. Yes.

21 Q. Okay. And you write, "At the  
22 micro -- at the more micro-level, there are  
23 many benefits from driving. In my data,  
24 drivers mentioned that this work has helped  
25 them become a person -- become a person as

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 71

1 DR. LINDSEY CAMERON

2 they're able to open a checking account and  
3 apply for credit cards for the first time",  
4 right?

5 A. Correct.

6 Q. And then it goes on to say,  
7 "I've found that ride-hailing can increase  
8 drivers personal and professional network to  
9 help them access resources such as home  
10 repairs, services, clients for other businesses  
11 projects or other types of work", right?

12 A. Yes.

13 I wrote a paper about that.

14 Q. Which paper was about that?

15 A. You can see it right there,  
16 Footnote 13.

17 Q. Oh, yeah. Okay.

18 We'll talk about that paper in a  
19 little bit. I know that one.

20 And then it says, "Most  
21 importantly, because of the low barrier to  
22 entry and scheduling flexibility, these  
23 companies provide an opportunity for drivers to  
24 earn who may not be able, or even want to,  
25 secure traditional employment."



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 72

1 DR. LINDSEY CAMERON

2 Do you see that?

3 A. I see that.

4 Q. And then, "Several drivers I  
5 interviewed were able to supplement other  
6 earnings or flex their schedule around health  
7 issues or child/elder care."

8 A. That's true.

9 I want to say, yes, I see that.  
10 My opinions on that have evolved a bit since  
11 2021 and it's coming out into my work -- more  
12 recent work.

13 Q. And we'll talk a little bit more  
14 about that later, but I have a question, which  
15 is, do you still believe that scheduling  
16 flexibility is a benefit of ridesharing?

17 MS. POLLOCK: Object to form.

18 THE WITNESS: It's -- it's a  
19 tricky -- it's a complex question to  
20 answer, from a researcher's perspective.

21 At a very basic level, you can  
22 say, yes, there is schedule flexibility  
23 because I can open up the app and drive.

24 I think that when you look at it  
25 from a more multifaceted complex way from

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 73

1 DR. LINDSEY CAMERON  
2 a structural ethnographer, which I am,  
3 you realize that schedule flexibility is  
4 not as flexible as portrayed, and there's  
5 lots of constraints around it, is it  
6 really flexible?

7 But I do know that many drivers  
8 talk about schedule flexibility as being  
9 a good thing and the reason why they like  
10 driving.

11 BY MR. WYATT:

12 Q. And should we credit those  
13 drivers use of the benefits of flexibility or  
14 should we be skeptical of those drivers use?

15 MS. POLLOCK: Object to form.

16 THE WITNESS: The answer is  
17 both.

18 BY MR. WYATT:

19 Q. Okay. Say more about that.

20 MS. POLLOCK: Object to form.

21 THE WITNESS: That's not a  
22 question.

23 BY MR. WYATT:

24 Q. Can you explain what you mean by  
25 the answer is both?

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 74

1 DR. LINDSEY CAMERON

2 A. So that goes to the heart of  
3 what my -- my approach as a researcher, as  
4 being a structural ethnographer, is that I look  
5 at workers' individual experiences, but I also  
6 look at how it's nested in wider structural  
7 forces, whether that's algorithmic management  
8 or the economy or technology or cultural  
9 narratives.

10 And so it's about using  
11 individual narration, along with, how do you  
12 understand organizations and society that helps  
13 you become -- paint a better picture about what  
14 is happening behind just the individual level.

15 And that's why I say it's both,  
16 and that's why I am a structural ethnographer.

17 Q. So, let's see.

18 We have a driver who tells you  
19 they believe that the biggest benefit of being  
20 a driver is the flexibility for their schedule.

21 What's the method we use to  
22 evaluate whether that person is right about the  
23 flexibility being the biggest benefit for them,  
24 in being a driver?

25 MS. POLLOCK: Object to form.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 75

1 DR. LINDSEY CAMERON

2 THE WITNESS: Can you say that  
3 one more time, please?

4 BY MR. WYATT:

5 Q. Sure.

6 From the perspective of -- of --  
7 is the field structural ethnographer, is that  
8 what you said?

9 A. Yes.

10 Q. From the perspective of the  
11 field of structural ethnography, how do we  
12 decide a driver is right when the driver tells  
13 us that he or she believes that schedule  
14 flexibility is the best benefit of being a  
15 driver?

16 MS. POLLOCK: Object to form.

17 THE WITNESS: So my response  
18 would be, there is no right.

19 BY MR. WYATT:

20 Q. Okay.

21 A. The individual could have their  
22 individual value of feeling like this work is  
23 flexible for whatever reason.

24 And for my job as an  
25 ethnographer is to look at that in contact --

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 76

1 DR. LINDSEY CAMERON

2 in context, you know, comparing what different  
3 people say, comparing with archival, comparing  
4 with what's happening in a societal,  
5 organizational or a field level, to rate a more  
6 broader perspective of what's happening.

7 And there is no right or wrong,  
8 it's just different lenses of analysis.

9 Q. Okay. I'll pause for more  
10 questions about that, but let's move on to the  
11 next paragraph here.

12 It says, "Lastly, these  
13 companies, or more precisely, drivers, save  
14 lives. One person every hour dies from a drunk  
15 driving-related accident. That is two people  
16 in the course of this meeting. Research from  
17 various colleges, all find that incidents in  
18 DUIs drop when a ride-hailing company enters a  
19 city. In Philadelphia, the number of drunk  
20 driving arrests have dropped by 14 percent."

21 Do you see that?

22 A. Yes.

23 Q. Is that still an opinion you  
24 hold about the benefits of drivers?

25 A. Yes.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 77

1 DR. LINDSEY CAMERON

2 That's an opinion I still hold.

3 Q. Okay. And then --

4 A. But -- but there's lots of  
5 research that backs it up too. It's not  
6 just -- it's more than what I'm just citing  
7 right here.

8 Q. Okay. And is that something  
9 that you continue to study as part of your work  
10 in this space?

11 A. No. I've never studied this.

12 Q. Okay. Okay.

13 But -- you have a citation here  
14 and so you've looked it up once or twice for  
15 purposes of fitting it into this testimony  
16 anyway, is that fair?

17 A. Yes. One of the people on my  
18 dissertation committee is connected to this  
19 type of research, so I've -- I've read it.

20 Q. Okay. And then just to close  
21 out this document, and you have a section also  
22 on -- you covered benefits and this section is  
23 on challenges, correct?

24 A. Yes.

25 Q. Okay.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 78

1 DR. LINDSEY CAMERON

2 And then one of the challenges  
3 is in Paragraph C, you note, "Drivers can be  
4 unfairly penalized and deactivated. In my  
5 work, drivers report being blocked based on  
6 unsubstantiated customer complaints, such as a  
7 customer saying the car smells like marijuana  
8 or the driver is drunk and having no means to  
9 appeal the decision."

10 Do you see that?

11 A. Yes.

12 Q. Were you talking about Uber  
13 specifically when you're referencing  
14 unsubstantiated customer complaints?

15 A. You know, when I interviewed  
16 people, I call the company ride hail, because I  
17 have Uber, Lyft and Juno on there.

18 Q. I see.

19 A. I can't specifically say it was  
20 an Uber driver, but I have this data so much --  
21 I mean, I have these people saying they've been  
22 blocked unfairly so often, that I'm assuming  
23 some of them have to be Uber drivers.

24 Q. I see.

25 And that -- and that answers

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 79

1 DR. LINDSEY CAMERON

2 another question I had, because I saw in some  
3 of your writings, referenced to Ride-Hailing,  
4 capital R, H, and I wasn't sure what that was,  
5 but this is a -- a placeholder that kind of  
6 covers all ride-hailing companies that you just  
7 described.

8 Is that right?

9 A. Exactly.

10 Q. Okay. And do you have an  
11 opinion about the right way to substantiate  
12 customer complaints?

13 MS. POLLOCK: Object to form.

14 THE WITNESS: Honestly, no.

15 That's outside of my realm of expertise.

16 BY MR. WYATT:

17 Q. And you provide some examples  
18 here; car smells like marijuana, driver is  
19 drunk.

20 Can you think of other examples  
21 that you became familiar with, through your  
22 work, that drivers cited as unsubstantiated  
23 customer complaints that causes them to be  
24 blocked?

25 A. Yes.



## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 80

1 DR. LINDSEY CAMERON

2 I think there is a time where a  
3 driver was accused of touching a women or  
4 saying something inappropriate, might have been  
5 saying something inappropriate, and they were  
6 blocked.

7 Something about something being  
8 broken in their car. Like, Uber thought they  
9 got into an accident or their car wasn't  
10 drivable, but it was actually drivable.

11 People talk about being scammed  
12 by customers quite a bit, like, customers will  
13 say, they did -- the ride dropped them off at  
14 the wrong place or they took the wrong customer  
15 and so then the driver gets reprimanded because  
16 supposedly they didn't give the right person a  
17 ride, and drivers are like that's not true, the  
18 individuals were lying, they were in the car.

19 So that's just a few of the  
20 examples, but my research doesn't really focus  
21 on this. So that's just what I remember off  
22 the top of my head.

23 Q. Okay. That's fair.

24 And that's -- that's a few  
25 examples.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 81

1 DR. LINDSEY CAMERON

2 Do you have an opinion about  
3 whether it was good or bad, that these  
4 individuals felt that they were deactivated  
5 based on unsubstantiated complaints, or is this  
6 just an observation?

7 MS. POLLOCK: Object to form.

8 THE WITNESS: Just -- I'm  
9 remembering another example, because I'm  
10 going through my Roladex.

11 I think there was some  
12 altercation between a customer and a  
13 driver and the customer felt like -- the  
14 driver felt the customer attacked them,  
15 but then they were the ones that were in  
16 trouble or they were the ones that were  
17 blocked, but to answer your question, do  
18 I have any conclusions about this?

19 I think I'm most concerned about  
20 when drivers say they don't have a means  
21 of recourse to get back on the platform.

22 I think personally -- or to like  
23 adjudicate their claims. I think that's  
24 personally what concerns me the most, but  
25 my research doesn't focus on this at all,

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 82

1 DR. LINDSEY CAMERON

2 so it's not, like -- it's not, like, my  
3 research peer-reviewed opinion right  
4 there.

5 BY MR. WYATT:

6 Q. Okay. I appreciate that caveat.

7 So would you think about the  
8 problem differently if the block from the  
9 platform related to a report about a safety  
10 issue, as compared to a smell or something  
11 that's not safety related?

12 MS. POLLOCK: Object to form.

13 THE WITNESS: I feel like you're  
14 asking me to think or speculate about  
15 things that are way outside of my -- my  
16 area of expertise.

17 BY MR. WYATT:

18 Q. That's fair.

19 And -- and to be fair, if your  
20 response is, I don't have an opinion on that or  
21 I haven't look at that or whatever, that's a  
22 totally acceptable answer from my perspective.

23 So if that's not one of your  
24 opinions, we can move on.

25 A. I mean, yes.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 83

1 DR. LINDSEY CAMERON

2 I felt if I was to answer that  
3 question, I would just -- I wouldn't be telling  
4 you what I actually know from my research, so I  
5 really don't have an expert opinion on that.

6 Q. Okay. And -- and just to round  
7 out this list we've been talking about, your  
8 testimony in legislative settings and we've  
9 covered two examples.

10 Is that the complete list of  
11 legislative testimony that you've given?

12 A. Yes.

13 Q. Okay.

14 A. And just for the record, I would  
15 say my prior comment about, you know, I think,  
16 you know, it's upsetting that workers may not  
17 have a way to, like, address these grievances,  
18 that's, again, not my expert opinion, that's  
19 just my personal reaction to hearing their  
20 stories.

21 Q. Okay. That's fair.

22 MR. WYATT: How would now be for  
23 a brief break?

24 THE WITNESS: Sounds good.

25 MR. WYATT: Okay.

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Page 84

1 DR. LINDSEY CAMERON

2 THE VIDEOGRAPHER: Going off the  
3 video record. The time is 3:25 p.m.

4 - - -

5 (Whereupon, a recess took place  
6 from 3:25 p.m. to 3:28 p.m.).

7 - - -

8 THE VIDEOGRAPHER: We are back  
9 on the video record. The time is 3:38  
10 p.m., this begins Media Unit Number 2.

11 BY MR. WYATT:

12 Q. All right. Welcome back,  
13 Dr. Cameron.

14 Ready to go?

15 A. Ready.

16 Q. All right.

17 I have received from your  
18 counsel the retainer invoice that we discussed  
19 and I'm going to introduce that as Exhibit 8,  
20 just to identify it.

21 - - -

22 (Whereupon the document was  
23 marked, for identification purposes, as  
24 Exhibit Number 8.)

25 - - -

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Page 85

1 DR. LINDSEY CAMERON

2 BY MR. WYATT:

3 Q. And I'll share it, just so you  
4 can look at it quickly.

5 Does this look like that invoice  
6 dated May 23rd, 2024?

7 A. Yes.

8 Q. Sorry. I didn't catch that.

9 A. Yes.

10 Q. Okay. Great. I don't have any  
11 questions about that.

12 We were talking about your prior  
13 testimony and I'll put that list back up for  
14 us.

15 And we're looking at Exhibit C  
16 to your report, which is Exhibit 1 to this  
17 deposition, and we talked about the first two  
18 items, which were the legislative hearings, and  
19 then there's six other items on the list, which  
20 are all cases.

21 Is that right?

22 A. Correct.

23 Q. Okay. And it looks like  
24 Numbers 3 through 7 out of 8, are cases that  
25 were brought against Uber.

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Page 86

1 DR. LINDSEY CAMERON

2 Is that correct?

3 A. Yes. Number 7 is Uber and Lyft.

4 Q. I see that. Okay.

5 And were you retained as an  
6 expert on behalf of the plaintiff in -- in all  
7 these cases, including Number 8?

8 A. Which side is the -- I'm not  
9 sure which side is the plaintiff.

10 Q. Oh, that's fair.

11 So that's -- in these cases,  
12 that's going to be the side that is suing the  
13 Uber, Lyft, Shipt, the companies.

14 A. Yes.

15 Well, each one of those say  
16 plaintiff on it, so I'm saying, yes, I was on  
17 the plaintiff side.

18 Q. Got it. Okay.

19 And fair enough, you're not  
20 steeped in plaintiff versus defendant, but I  
21 think -- yeah. Okay. I think we're talking  
22 about the same thing. Okay.

23 A. I just -- I just don't want to  
24 make a mistake because I know we speak two  
25 different languages.

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Page 87

1 DR. LINDSEY CAMERON

2 Q. We do.

3 And that's clear on the record,  
4 so I think we're good for this one, but as  
5 those issues of legal versus academic or  
6 whatever the appropriate label for your field  
7 is, just flag those things for me and we'll  
8 work it through if we have to define terms or  
9 anything, I appreciate that.

10 So you've testified against Uber  
11 in at least five lawsuits before this one.

12 Is that a fair summary?

13 A. Yes.

14 Q. Okay. Can you describe at a  
15 high level, what the cases against Uber were  
16 about?

17 A. At a high level, I believe those  
18 cases are about -- the first one, two, three --  
19 the four, that are all by Kherkher Garcia,  
20 Number 6 was by Kherkher Garcia, was about  
21 back -- like something about pay, I think.

22 Like, classification was in  
23 there, but I think they were really about  
24 getting paid for -- for workers.

25 And 7 was about, I think, worker



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Page 88

1 DR. LINDSEY CAMERON

2 classification, maybe, with also pay involved,  
3 but I really just talked about control.

4 Q. Okay. And fair enough.

5 Your focussed on your role in  
6 these cases, it sounds like you weren't super  
7 deep in the specific facts of each case.

8 Is that fair?

9 A. That's correct.

10 Q. Okay.

11 Generally speaking, were the  
12 opinions in these cases also focused on topics  
13 like organizational control and algorithmic  
14 management?

15 MS. POLLOCK: Object to form.

16 THE WITNESS: Can you say the  
17 question one more time?

18 BY MR. WYATT:

19 Q. Sure.

20 Were your opinions in these  
21 cases against Uber also about topics like  
22 organizational control and algorithmic  
23 management?

24 MS. POLLOCK: Object to form.

25 THE WITNESS: Yes.

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Page 89

1 DR. LINDSEY CAMERON

2 BY MR. WYATT:

3 Q. And I'm -- I'm not trying to be  
4 tricky, I just want to understand.

5 Is it basically the same topics,  
6 or is there one sort of very different from the  
7 one issues you're discussing in your report in  
8 this case?

9 A. I don't understand the question  
10 now.

11 Q. Were you addressing topics like  
12 organizational control in each of these cases?

13 A. Yes. I was.

14 Organizational control,  
15 algorithmic management, yes.

16 Q. Were there any other topics that  
17 you addressed in these cases that you don't  
18 touch on in the report, in this case?

19 A. No. I don't think so.

20 I talk about more things in this  
21 report than I did in the prior reports, but I  
22 don't -- well, that's not true.

23 There's some -- some of those  
24 cases, because they're, like, with an  
25 individual, there's, like, specific things

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 90

1 DR. LINDSEY CAMERON

2 around that individual that came into each of  
3 the report -- that -- that was, you know, I  
4 guess, the equivalent in this would be when I  
5 talked about, I think, the five bellwethers or  
6 the five individuals.

7 Q. Okay. Okay. That's understood.

8 Okay. So -- and you mentioned  
9 this already, but the Massachusetts AG case,  
10 that one involved not just Uber, but also Lyft.

11 Is that right?

12 A. Correct.

13 Q. And tell me about your process.

14 Do you reuse parts of prior  
15 reports in reports for subsequent cases, in  
16 part, at least?

17 MS. POLLOCK: Object to form.

18 THE WITNESS: I have reused  
19 parts of one case for another case, if  
20 the questions are similar or related to  
21 one another.

22 BY MR. WYATT:

23 Q. Okay. And --

24 A. And if my opinion hasn't  
25 changed.

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Page 91

1 DR. LINDSEY CAMERON

2 MS. POLLOCK: I want to -- my  
3 objection wasn't noted in the record, if  
4 you could please note it.

5 Thank you.

6 BY MR. WYATT:

7 Q. Let me -- let me just focus that  
8 question on one part of the report here, on  
9 page -- oops. Hold on a second.

10 That's the wrong copy.

11 If we go to Paragraph 86 of your  
12 report, which is on Page 42. I just want to  
13 make sure I understood this and I -- my guess  
14 is that this is a -- an artifact of a -- a  
15 reuse issue, but I just want to make sure I  
16 understood it correctly.

17 So in this sentence, it says, "I  
18 will describe the mechanics of a driver  
19 completing a ride, which at this level of  
20 generality is virtually identical for both  
21 companies."

22 By both companies, do you mean  
23 Uber and Lyft?

24 A. Correct. That's an artifact  
25 from the Massachusetts report.

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Page 92

1 DR. LINDSEY CAMERON

2 Q. Okay. And there might be a  
3 couple other places where this happens, but if  
4 that happens, you're -- I can assume both  
5 companies really, for purposes of this case,  
6 just means Uber.

7 Is that fair?

8 A. Exactly.

9 And also, when you think about  
10 my research, my research is about ride-hailing.  
11 So I looked -- there's part of my theorizing  
12 that -- that algorithmic management work is  
13 very similar on Uber and Lyft and similar --  
14 you know, similar sort of ride-hailing  
15 companies.

16 So often, many -- if you read my  
17 papers, it's not so much, like, I'm pointing a  
18 finger at Uber, I'm more speaking about the  
19 industry more generally. So, yes, if you see  
20 artifacts in both companies, it's an artifact  
21 from the Massachusetts case.

22 Q. Okay. And are you relying on  
23 any materials that you reviewed in the  
24 Massachusetts case to support your opinions in  
25 this case?

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Page 93

1 DR. LINDSEY CAMERON

2 A. I have access -- I don't have  
3 any of the materials from the Massachusetts  
4 case. I shred everything at the end of the  
5 report.

6 Q. Okay.

7 A. But I -- it's -- it's in my  
8 head. It's in my general knowledge.

9 Q. Sure. Okay.

10 And would the same be true for  
11 the other cases against Uber, that you would --  
12 you would have had the materials for a time,  
13 but shredded them and they're not forming any  
14 of your opinions in this case either?

15 A. Correct. I'm a former CIA  
16 officer, so that was part of my training.

17 Q. Sure. All right.

18 Fair enough. Fair enough.

19 If anyone knows when to shred  
20 stuff, it should be you.

21 Is that fair?

22 A. Yes, sir.

23 MS. POLLOCK: Objection.

24 MR. WYATT: I didn't mean it  
25 that way.

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Page 94

1 DR. LINDSEY CAMERON

2 I thank you for your service is  
3 where I was going with that, actually,  
4 but I went to -- to Argo, the movie about  
5 being out of Iran as the -- under siege.

6 THE WITNESS: Thank you.

7 I appreciate it.

8 BY MR. WYATT:

9 Q. Okay. So -- let's see.

10 Let me just get us back to the  
11 list here. And then Number 8 is not a case  
12 involved -- why -- oh, no, is it a case  
13 involving ride-hailing companies or not, it's  
14 Attorney General Versus Shipt, and I don't know  
15 if Shipt is the only defendant?

16 A. No. It doesn't involve a  
17 ride-hailing company.

18 Q. What at a high level is that  
19 case about, if you know?

20 A. I don't.

21 Q. Do you know if Mr. Okapaku is an  
22 expert also in the Shipt case?

23 A. I don't.

24 Q. Okay. So you didn't respond to  
25 his opinion in that case, as far as you know?

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Page 95

1 DR. LINDSEY CAMERON

2 A. I didn't know he was part of  
3 that case.

4 Q. Okay.

5 And in the Shipt case, are you  
6 also addressing issues of organizational  
7 control or is it about other topics?

8 MS. POLLOCK: No. Hold on.

9 I'm going to instruct the  
10 Witness to be careful not to disclose any  
11 information that is subject to any kind  
12 of confidentiality arrangement you have,  
13 if you haven't been disclosed yet, your  
14 opinions.

15 MR. WYATT: Oh, that's fair.

16 It only says deposition and  
17 subject to protective order.

18 Okay. That's fine.

19 BY MR. WYATT:

20 Q. I mean, do you know at a high  
21 level what the allegations in the case are?  
22 Did I ask you that already?

23 A. The case has settled.

24 Q. Okay.

25 A. So I think you can find out all



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Page 96

1 DR. LINDSEY CAMERON

2 the information you want that way.

3 Q. Got it. Okay. All right.

4 Let's go earlier in your report,  
5 and here you're describing your qualifications,  
6 in Paragraph 4.

7 You're currently an assistant  
8 professor in management at the Wharton School  
9 of the University of Pennsylvania, is that  
10 correct?

11 A. Correct.

12 Q. And you say in Paragraph 5, you  
13 teach an executive course on the future of work  
14 in graduate classes on managing emerging  
15 enterprises, right?

16 A. Correct.

17 Q. And what topics do you cover in  
18 those, in that courses, in those --

19 A. In that -- yes.

20 In that course, I cover  
21 motivation, incentive systems, job design,  
22 hiring, performance appraisals, organization  
23 design and high-performance work systems.

24 Q. And do you teach classes that  
25 are based on the work that you're relying on in

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 97

1 DR. LINDSEY CAMERON  
2 this case about the gig economy and  
3 ride-hailing platforms?

4 A. Yes.

5 Q. And what's that course about or  
6 what's that course called?

7 A. The -- my class on motivation.  
8 I talk a lot about the ride-hailing industry.

9 Q. Okay. And it says you also --

10 A. Oh, well, there's another class  
11 I talk more about the package delivery industry  
12 which, sorry, you asked me about Uber.

13 Q. Okay. Okay. Fair enough.

14 You also say you hold, in  
15 Paragraph 4, a courtesy appointment in  
16 sociology at the University of Pennsylvania.

17 Is that right?

18 A. Yes.

19 Q. And does that mean you teach  
20 classes there as well? What does a courtesy  
21 appointment entail?

22 A. No. I don't teach classes in  
23 sociology. I just give talks in the sociology  
24 department, and I review for sociology  
25 journals, but, no, I don't teach in that

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Page 98

1 DR. LINDSEY CAMERON

2 department.

3 Q. Okay. And then it says, you are  
4 a faculty associate at the Harvard Law School's  
5 Berkman Klein Center for Internet and Society,  
6 right?

7 A. Yes.

8 Q. And what do you do in that role?

9 A. I've given talks at  
10 Berkman Klein.

11 Q. Okay. On what types?

12 A. The gig economy.

13 Q. Okay. Do you teach any courses  
14 on employment law?

15 A. No.

16 Q. Are you an expert in employment  
17 law?

18 A. No.

19 MS. POLLOCK: Object to form.

20 Go ahead.

21 BY MR. WYATT:

22 Q. It also says here, faculty  
23 affiliated and prior fellow at the Data and  
24 Society Research Institute in New York City,  
25 right?

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Page 99

1 DR. LINDSEY CAMERON

2 A. Correct.

3 Q. And what do you do in that role?

4 A. So I was there for a year where  
5 I was involved in, like, a research project  
6 that they helped support.

7 I gave talks. They write a lot  
8 of policy, briefs or give presentations, I give  
9 feedback on. I mean, so now, as a fellow, it's  
10 more giving talks, giving feedback, going to  
11 conferences they host, things like that.

12 Q. Okay. And same thing, like, do  
13 you -- when you give talks here, is it on the  
14 same topics we've been discussing?

15 A. Yes.

16 Q. Okay. And then if we go to  
17 Paragraph 7, it says, "As an organizational and  
18 management scholar, my research is grounded in  
19 the disciplines of psychology and sociology,  
20 and my research program is primarily  
21 qualitative and draws on the norms and  
22 standards of qualitative methodology in the  
23 organizational management field which  
24 emphasizes in-depth immersion and observation."

25 Do you see that?

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Page 100

1 DR. LINDSEY CAMERON

2 A. Yes.

3 Q. And then it goes on to say,  
4 "Research using qualitative methods is among  
5 the most impactful, highly cited, and  
6 ground-breaking in the field of organizational  
7 management, evident in the numbers of awards  
8 and citations as compared to studies that use  
9 other research methodologies."

10 Do you see that?

11 A. Yes.

12 Q. And what is this relevant to?  
13 You state qualitative methods is  
14 amongst the most impactful.

15 Compared to what other methods?

16 A. Qualitative methodologies.

17 Q. Okay. And why is that?  
18 Why is that -- well, you say  
19 most impactful.

20 Are you saying more impactful  
21 than qualitative methods?

22 A. Yes. I'd say more impactful  
23 and -- and there is specific research I'm  
24 drawing on.

25 When you look at the number of

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Page 101

1 DR. LINDSEY CAMERON  
2 best paper awards in our field, if you see that  
3 as a recognition of impact, because it is  
4 field-wide, they disproportionately vote to  
5 qualitative papers. I was just teaching this  
6 on Monday.

7 Six out of the past eight best  
8 papers awards in a particular journal has gone  
9 qualitative methods, and qualitative  
10 researchers are probably only about 10 to 15  
11 percent of the field in terms of number of --  
12 of researchers.

13 Q. And when you say the field,  
14 like, which fields specifically are you --

15 A. Organizational management,  
16 organizational theory, organizational behavior.

17 Q. -- okay.

18 And so, that's the metric that  
19 you're using, is awards and numbers of  
20 citations within that field, qualitative versus  
21 quantitative?

22 Is that right?

23 A. Awards. I didn't -- I didn't  
24 say -- well, I'm trying to think about  
25 citations.

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Page 102

1 DR. LINDSEY CAMERON

2 Off the top of my head, I don't  
3 remember the -- the actual -- which study,  
4 which says more citations go to qualitative  
5 papers, but off the top of my head, I know  
6 awards disproportionately go to those who do  
7 qualitative research.

8 Q. Okay. And why do you think  
9 qualitative research is awarded more frequently  
10 than quantitative research in this field?

11 A. Because it generates new  
12 theories.

13 Q. And are new theories valued more  
14 highly than testing old theories or why does  
15 that make something more likely to be awarded,  
16 in your view?

17 MS. POLLOCK: Object to form.

18 THE WITNESS: In our field, and  
19 I think in academia in general, the core  
20 is how do you create new knowledge?

21 Quantitative research can just  
22 test what is already existing, so there's  
23 limited theoretical contribution there.

24 You use qualitative research  
25 when you're trying to study something

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 103

1 DR. LINDSEY CAMERON

2 that's new or groundbreaking phenomenon,  
3 which is what the gig economy is.

4 And so because qualitative  
5 research is a method poised to look at  
6 new and emerging phenomenon, it allows us  
7 to push what we know about theory and  
8 that's one of the reasons it receives so  
9 many awards.

10 BY MR. WYATT:

11 Q. I see.

12 So academia places an emphasis  
13 on development of new theories, is that what  
14 you're saying?

15 MS. POLLOCK: Object to form.

16 THE WITNESS: I'm saying  
17 academia values creating new knowledge.

18 And qualitative research is  
19 suited to create new knowledge and  
20 develop new theories, because it allows  
21 you to look at new phenomenon, as opposed  
22 to quantitative research, you are just  
23 testing what is already known, so the  
24 contribution is more limited.

25 BY MR. WYATT:



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 104

1 DR. LINDSEY CAMERON

2 Q. And quantitative research is  
3 there to validate the new theories that  
4 qualitative research creates?

5 Is that a right way to think  
6 about it?

7 MS. POLLOCK: Object to form.

8 THE WITNESS: Not quite.

9 BY MR. WYATT:

10 Q. In what way?

11 MS. POLLOCK: Object to form.

12 THE WITNESS: A quantitative  
13 theory can never actually test the theory  
14 that qualitative proposes, because  
15 qualitative theory is much -- it's more  
16 abstract.

17 It's more generalizable, it's  
18 what we would consider like grand  
19 socialist theory about how systems works.

20 You know, what a quantitative  
21 measure can do is only test a very small  
22 part of that and it can't -- you know, it  
23 has to make lots of assumptions and its  
24 measurements and what constructs it can  
25 map on to.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 105

1 DR. LINDSEY CAMERON

2 So your -- I think the comment  
3 of, can you -- do you test quantitative  
4 theory with qualitative, just doesn't  
5 make sense, from within the lens of our  
6 profession.

7 BY MR. WYATT:

8 Q. Okay.

9 I think I understand that.

10 So how does one know whether a  
11 qualitative theory is correct?

12 A. So there's a great book that I  
13 cite in the report. I think it's Small and  
14 Calarco, 2022. It's called Developing  
15 Qualitative Literacy and they have six  
16 different dimensions.

17 I mean, these are people who are  
18 not only award-winning qualitative researchers,  
19 but like sit on the board of the  
20 National Science Foundation for, like,  
21 evaluating these research proposals, and I also  
22 do work at the National Science Foundation.

23 But if there's, like, six  
24 different things about how can you test a  
25 qualitative research and the theory is

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Page 106

1 DR. LINDSEY CAMERON

2 rigorous.

3 I'm not going to remember all  
4 six, but I know they're in the paper, but it  
5 includes, like, palpability of the data,  
6 heterogenically, the rest are in there, but  
7 there's -- there's a system of how do you  
8 evaluate qualitative research.

9 And I think qualitative research  
10 goes to the peer-review process, just like  
11 quantitative research.

12 BY MR. WYATT:

13 Q. Do you know if theories  
14 generated through the qualitative process have  
15 been accepted to the form of expert opinion by  
16 courts of law?

17 MS. POLLOCK: Object to form.

18 THE WITNESS: I don't even know  
19 how to answer that question.

20 BY MR. WYATT:

21 Q. Is that something that people in  
22 academia think about when crafting theory as --  
23 as whether those theories would be accepted in  
24 a court of law?

25 MS. POLLOCK: Object to form.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 107

1 DR. LINDSEY CAMERON

2 Calls for a legal conclusion and  
3 complete hypothetical.

4 THE WITNESS: I've never thought  
5 of this question before. I don't know if  
6 I can answer. I don't think I can say  
7 this question.

8 BY MR. WYATT:

9 Q. Have you published your work  
10 previously in law reviews or law journals?

11 A. No. I have not.

12 I have some qualitative work in  
13 law journals, though. Veena Dubal, if you're  
14 familiar with her work?

15 Q. I am not, but I'll take a look  
16 at it.

17 A. She publishes a lot about the  
18 ride-hailing industry and Uber.

19 She's at UC Hastings.

20 Q. How do you spell the last name?

21 A. Dubal, D-u-b-a-l.

22 Q. Okay.

23 A. I actually have an article  
24 coming out with her shortly.

25 Q. Okay. What about?

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Page 108

1 DR. LINDSEY CAMERON

2 A. The concept is called Ghost  
3 Variables. So it's about how things, like,  
4 race, gender, cast, immigration status,  
5 actually shape work in the gig economy, but we  
6 often don't see these variables and we're just  
7 focused on the technology.

8 Q. Is that also a qualitative  
9 piece?

10 A. It's more like a review essay.  
11 So a lot of -- it's almost like  
12 an edited volume, so where people put in their  
13 different pieces. So my piece is theoretical.  
14 I don't remember what type of data that Veena  
15 is using in her piece.

16 Q. Okay. Switching gears slightly  
17 to your -- your -- your studies, prior to your  
18 current role.

19 Your undergraduate and masters  
20 degrees are in electrical engineering, computer  
21 science and engineering management.

22 Is that right?

23 A. Correct.

24 Q. And what was the path for you  
25 from electrical engineering to structural --

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Page 109

1 DR. LINDSEY CAMERON

2 I'm missing the second word, but your current  
3 role?

4 A. Ethnographer.

5 Q. Ethnographer.

6 A. It's funny that you ask that,  
7 we're actually not as unusual as you would  
8 think. There are quite a few of us who start  
9 in engineering and then end up doing  
10 qualitative research, but, you know, I was  
11 living in the Middle East for many years and  
12 decided it was time for a career change and was  
13 thinking about should I get an MBA or a PhD,  
14 and I mentor said, hey, you're really smart I  
15 think you're going to want to get a PhD, that  
16 you won't be satisfied with an MBA, and that's  
17 why I ended up in the PhD program.

18 Q. But teaching at business school,  
19 so you kind of have the best of both worlds?

20 A. I enjoy being -- I enjoy my  
21 academic life.

22 Q. Okay. Okay.

23 Did you study psychology or  
24 sociology at all as an undergraduate or  
25 master's student?

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 110

1 DR. LINDSEY CAMERON

2 A. I did take a class in psychology  
3 as an undergrad. I'm trying to think. I felt  
4 like I took -- and I think I took some that  
5 might have been sociology in public health,  
6 maybe, as an undergrad too.

7 I'm not sure of my master's  
8 program. I know I learned a lot about  
9 terrorist and counter-terrorism psychology, but  
10 I can't remember if that was in my degree  
11 program or that was more of my job because, you  
12 know, I served in the Middle East for a long  
13 time.

14 Q. And what was your role when you  
15 were in the Middle East?

16 A. I worked with the U.S.  
17 Intelligence Community. I was an analyst.

18 Q. And did that draw in your --  
19 your undergrad background, your electrical  
20 engineering and computer science skills?

21 A. It did. Also drew on my French  
22 and Arabic skills. It drew on my understanding  
23 cultures, like culture and how people work and  
24 think. It was very interdisciplinary, my work  
25 in the government.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 111

1 DR. LINDSEY CAMERON

2 Q. Did you ever take any classes on  
3 law in any of your -- in any of your education?

4 A. No.

5 Q. And then if we look at your CV,  
6 you got your PhD in 2020?

7 A. Correct.

8 Q. And how long was that program?

9 A. I entered in 2013.

10 Q. And did you focus on  
11 organizational management for that entire  
12 period or no?

13 A. My first year I was more micro,  
14 I focused more on organizational behavior. But  
15 by my second -- beginning of my third year, I  
16 was more in organizational theory.

17 Q. Okay. And then when did you  
18 begin your project of driving on and speaking  
19 with drivers on, you know, who used the Uber  
20 platform?

21 A. 2016.

22 Q. Okay. And how long that that  
23 project continue?

24 MS. POLLOCK: Object to form.

25 THE WITNESS: I would say it's



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Page 112

1 DR. LINDSEY CAMERON

2 not over. This is all -- this is all my  
3 research. This is all I do.

4 BY MR. WYATT:

5 Q. Okay. Fair enough.

6 But it was -- I mean, there was  
7 a -- there was a dissertation that some of the  
8 work was done for.

9 Is that fair?

10 A. Yes. That's true.

11 Q. And what was the kind of  
12 dissertation era of this project?

13 A. I finished my dissertation in  
14 2020.

15 Q. Okay. And did you continue,  
16 though, driving on the platform after 2020?

17 A. No.

18 Q. Did you continue interviewing  
19 drivers and riders after 2020?

20 A. Yes.

21 Q. And do those interviews continue  
22 to this day of drivers and riders?

23 A. No. So after 2020, I only  
24 actually interviewed drivers. I don't think I  
25 interviewed riders after 2020, and I have not

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Page 113

1 DR. LINDSEY CAMERON  
2 interviewed a driver in the United States since  
3 2020, I believe.

4 Q. Okay.

5 A. Approximately I've interviewed  
6 drivers in other areas of the world since then,  
7 but I think that's when I stopped interviewing  
8 drivers in the United States, I think.

9 Q. And have your -- have your  
10 opinions changed since your dissertation at  
11 all?

12 A. They've become much more refined  
13 since my dissertation. That is clear.

14 Q. Okay. Can you think of some  
15 specific examples of the ways it's been more  
16 refined?

17 A. I mean just, you know, the way I  
18 talk about autonomy and control, it's a  
19 dissertation, so it's not nearly as precise as  
20 the way I talk about autonomy and control and  
21 flexibility right now.

22 You know, there are different  
23 levels of rigor that are required to graduate  
24 with a dissertation versus getting a paper  
25 published.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 114

1 DR. LINDSEY CAMERON

2 And, you know, if -- like, one  
3 of my papers has won like six or seven  
4 different paper awards, so it's obviously a  
5 very different -- or final product than what my  
6 dissertation was.

7 Q. Okay. Let's -- sorry.

8 MR. WYATT: Okay.

9 I'm introducing your  
10 dissertation as Exhibit 9. It should be  
11 arriving in just a second.

12 - - -

13 (Whereupon the document was  
14 marked, for identification purposes, as  
15 Exhibit Number 9.)

16 - - -

17 BY MR. WYATT:

18 Q. -- (inaudible) -- one second.

19 Okay. Is this it?

20 A. Yeah. That's it.

21 Q. Hopefully not giving you any --  
22 (inaudible)?

23 A. A little bit.

24 Q. -- all right.

25 If we go to -- okay.

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Page 115

1 DR. LINDSEY CAMERON

2 If we go to Page 50, you write,  
3 "Several factors distinguish ride-hailing  
4 companies from liveries, resulting in their  
5 classification and regulation as technology  
6 companies. While both ride-hailing drivers and  
7 taxi drivers are independent contractors,  
8 ride-hailing drivers own or lease vehicles from  
9 an approved third-party vendor as opposed to  
10 owning an medallion."

11 Did I read that correctly?

12 A. Yes. You did.

13 Q. Okay. And is that still your  
14 understanding of ridesharing companies and  
15 their comparison and contrast from liveries and  
16 taxis?

17 MS. POLLOCK: Object to form.

18 THE WITNESS: So one thing --  
19 you know, are independent contractors, I  
20 would say are classified as independent  
21 contractors.

22 I mean, I'm not making a  
23 statement about whether or not -- what  
24 the legal classification of these workers  
25 should be, understanding what is in law,

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 116

1 DR. LINDSEY CAMERON

2 but there is a lot more that  
3 distinguishes ride-hailing companies from  
4 taxis than just that first sentence that  
5 I have written.

6 BY MR. WYATT:

7 Q. And what are some of those  
8 things, if you have anything specific in mind,  
9 that distinguished them from taxis?

10 A. I would imagine, if we kept  
11 reading, I would start listing some of them,  
12 but the first thing that comes to mind is  
13 algorithmic management.

14 Q. Okay. Anything else?

15 A. Yeah. Let me -- I'll sit here  
16 and think for a minute.

17 Q. Sure.

18 A. So the algorithmic management  
19 includes a lot of things about rating, pricing,  
20 maybe where the vehicle can't -- or well --  
21 where not the vehicle can travel to, that's  
22 actually outside of algorithmic management.

23 The safety checks for each --  
24 for taxis and ride-hailing companies might be  
25 different.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 117

1 DR. LINDSEY CAMERON

2 By far the business model and  
3 where profits go, or -- you know, the loyalty  
4 programs that -- that ride-hailing companies  
5 have, the taxi companies don't have is another  
6 difference.

7 I mean, this is not -- I'm  
8 telling you what I know from knowing the --  
9 like, my expertise, but I -- like, it's not  
10 my -- I have not written a paper that compares  
11 taxis versus ride-hailing drivers and I think  
12 Nick Ochutu, in 2017, did.

13 I mean, other people have,  
14 that's just not the type of paper I've written  
15 before.

16 Q. Okay. Okay.

17 And I appreciate that. Okay.

18 I think that's all the questions  
19 I have on this for now. We may come back to  
20 this, but we'll take it down.

21 And shifting gears here to your  
22 report, which I'll put back up here in a  
23 minute, but you're here today as a -- as a  
24 rebuttal expert.

25 Is that right?

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 118

1 DR. LINDSEY CAMERON

2 A. Yes.

3 Q. And I think you're rebutting  
4 certain opinions by Mr. Okapaku.

5 Is that your understanding as  
6 well?

7 A. Correct.

8 Q. Anybody else that you -- any  
9 other expert on the Uber side that you're  
10 responding to or intending to respond to?

11 A. No. I haven't -- I haven't read  
12 anybody else's rebuttal report. And -- oh, and  
13 I just wanted to add, I think Veena Dubal has  
14 written a lot comparing taxis to Uber drivers.

15 Q. Okay. Appreciate that.

16 Do you have a view as to what  
17 makes your report a rebuttal report?

18 MS. POLLOCK: Object to form.

19 Calls for a legal conclusion.

20 THE WITNESS: Can you say it one  
21 more time?

22 BY MR. WYATT:

23 Q. Sure.

24 Your report is titled Rebuttal  
25 Report. I'm just wondering if you have a view

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 119

1 DR. LINDSEY CAMERON

2 as to what makes it a rebuttal report.

3 MS. POLLOCK: Object to form.

4 THE WITNESS: I think what makes  
5 it a rebuttal report is I sort of go and  
6 dispute things that the other person said  
7 and provide rationale, reasoning,  
8 backing, about why I'm disagreeing about  
9 certain points they raised.

10 BY MR. WYATT:

11 Q. Okay. And do you think there  
12 are parts of your report that would standalone,  
13 even if you weren't responding to Mr. Okapaku  
14 specifically?

15 MS. POLLOCK: Object to form.

16 THE WITNESS: What does that  
17 mean, standalone for what?

18 BY MR. WYATT:

19 Q. Well, is there a version of this  
20 report that you could write that wouldn't be  
21 responsive to any particular expert, but would  
22 just be a report of yours on the issues you  
23 discuss in the report?

24 MS. POLLOCK: Object to form.

25 THE WITNESS: It could be,



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 120

1 DR. LINDSEY CAMERON

2 depending on what question you ask.

3 BY MR. WYATT:

4 Q. That's fair.

5 And I guess what I'm getting at  
6 is, you do address Mr. Okapaku in some parts of  
7 your report but not others, is that fair?

8 MS. POLLOCK: Object to form.

9 THE WITNESS: I address  
10 Mr. Okapaku directly in the first part  
11 where I say, summary of -- what do I call  
12 it? Summary of Rebuttal Arguments.

13 But then I -- the -- the other  
14 part of the report, I sort of add in all  
15 the reason, like, that's a summary and  
16 then the rest of my report speaks to why  
17 I'm able to have the rebuttal against  
18 him.

19 It's, like, providing the -- the  
20 evidence or the data I need for the  
21 summary claims. So, in my mind, they  
22 speak to one another.

23 BY MR. WYATT:

24 Q. Okay. So the first -- let's  
25 see -- in Paragraphs 14 -- the section you just

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Page 121

1 DR. LINDSEY CAMERON

2 described is called -- I'll start over.

3 Part 3 of your report is  
4 Summary of Rebuttal Arguments RE, Joseph  
5 Okpaku's Report, correct?

6 A. Correct.

7 Q. And then Paragraphs 14 through  
8 25 kind of speak directly to Mr. Okapaku and  
9 his opinions, right?

10 A. Correct.

11 MS. POLLOCK: Object to form.

12 BY MR. WYATT:

13 Q. And then, I'll represent to you,  
14 Mr. Okapaku is not mentioned in Paragraphs 26  
15 through 98, which is the rest of the report.

16 Is all of those -- are all of  
17 those paragraphs, though, responding to  
18 Mr. Okapaku?

19 A. I see them as responding to  
20 Mr. Okapaku, because in the paragraphs -- lets  
21 say in Paragraph 14, I sort of have -- I think  
22 actually Paragraph 16 is actually a better  
23 example.

24 You know, I say -- the name of  
25 the industry is ride-hailing, then I talk about

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 122

1 DR. LINDSEY CAMERON

2 algorithmic management by saying Uber matches  
3 workers and customers and then I say, see  
4 Section IX.

5 So while the second half of the  
6 report doesn't actually say Mr. Okapaku's name,  
7 I don't see Paragraph 16 as standing on its own  
8 without Section IX, because Section IX is the  
9 one that provides all the research and the  
10 detail to speak to it.

11 Q. I see.

12 So 16 needs Section IX to flush  
13 out what you're saying in 16.

14 Is that a summary of what you  
15 just said?

16 A. Yes. I agree with you.

17 Q. Okay. But if we deleted  
18 Paragraphs 14 through 25 and Section III and  
19 left the rest of the report, would that report  
20 standalone?

21 MS. POLLOCK: Object to form.

22 Calls for a legal conclusion.

23 THE WITNESS: So you asked me  
24 that question before, and the question --  
25 the -- the -- my response then is, well,

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 123

1 DR. LINDSEY CAMERON

2 it would depend on what you want the  
3 report to be about, like, what the  
4 question is and whether or not it could  
5 actually standalone.

6 I don't -- I don't know what the  
7 form of report is supposed to be.

8 BY MR. WYATT:

9 Q. That's a totally fair response.

10 And I see, for example, in  
11 Paragraph 2 of your report -- or actually  
12 Paragraphs 1 and 2, under the heading,  
13 Purpose of the Report, I have been asked -- and  
14 then you kind of describe what you've been  
15 asked to do.

16 Is that fair?

17 A. Yes.

18 Q. Okay. So if I hear what you're  
19 saying, you know, you've been asked to do a  
20 thing and so whether the report would stand on  
21 its own depends in part on whether you would  
22 answer the question you've been asked to  
23 answer.

24 Is that fair?

25 MS. POLLOCK: Object to form.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 124

1 DR. LINDSEY CAMERON

2 THE WITNESS: I agree.

3 Yes.

4 BY MR. WYATT:

5 Q. Okay. Let me see.

6 Let's go then to the specifics  
7 of the summary of the rebuttal, which starts at  
8 Paragraph 14 and I'll put this back on the  
9 screen so we can know -- be on the same thing.

10 All right.

11 In Paragraph 14, you write, "I  
12 find the analysis and conclusions of  
13 Joseph Okpaku's report incomplete and often  
14 inaccurately. Okpaku is not an academic and  
15 has not received a PhD, though, I acknowledge  
16 he's received a terminal degree in his field.  
17 To the best of my knowledge, he does not teach  
18 doctoral-level courses in any research  
19 methodology and has not written any  
20 peer-reviewed academic research", correct?

21 A. Correct.

22 Q. Okay. Why is it important  
23 whether Mr. Okapaku have a Phd, in your field?

24 MS. POLLOCK: Object to form.

25 THE WITNESS: So I didn't say he

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Page 125

1 DR. LINDSEY CAMERON  
2 needed to have a Phd in my field, but  
3 there's a level of rigor, to be frank,  
4 that I didn't find in Joseph Okpaku's  
5 report.

6 Even in reading his two medium  
7 articles, I found those to be puff  
8 pieces, you know, very -- and so the fact  
9 that he was not defining terms, not using  
10 evidence that I would find rigorous or  
11 critical, that all that made me not feel  
12 like his report was incomplete and  
13 inaccurate.

14 So does one need a PhD to be  
15 able to have complete and accurate  
16 results? I mean, I'm sure there are  
17 people that can do high-quality research  
18 without a doctoral-level degree, but in  
19 general, I found that his report was just  
20 -- it was weak.

21 BY MR. WYATT:

22 Q. And -- sorry. Go ahead.

23 A. I said it was weak, not  
24 rigorous.

25 Q. Okay.

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Page 126

1 DR. LINDSEY CAMERON

2 And if I asked why is it  
3 important that he doesn't teach doctoral  
4 courses and research methodology, would you  
5 have a similar answer?

6 MS. POLLOCK: Object to form.

7 THE WITNESS: I would say one of  
8 the ways you really get to know your  
9 craft is if you can teach other people  
10 your craft.

11 And so, one, he hasn't sort of  
12 -- in my mind, sort of shown the chops to  
13 be able to do research.

14 And, two, he's not teaching,  
15 which again, doesn't show the expertise  
16 in being able to conduct research, but  
17 also even being able to consume research.

18 I mean, some of the studies that  
19 he cited were not considered rigorous or  
20 well done or there was lots of research  
21 he missed.

22 And so there's -- being able to  
23 do research, there's also, can he even  
24 evaluate research?

25 So I didn't see him making any

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 127

1 DR. LINDSEY CAMERON

2 sort of these intellectual moves I would  
3 expect one to do in a solid expert  
4 report.

5 BY MR. WYATT:

6 Q. And what's the metric you're  
7 using to evaluate the solidness of an expert  
8 report?

9 A. Well, I mean, part of it is what  
10 I wrote in Paragraph 14 to 25. There are all  
11 of these critiques that I made about different  
12 claims he was making.

13 I'm also looking at what type of  
14 research that he's drawing on, whether it's,  
15 you know, what his experience is, what research  
16 papers he's citing, what reports he's -- he's  
17 bringing on, how is he defining terms? How is  
18 he logically building an argument from topic  
19 sentence to supporting evidence?

20 These are all different parts  
21 of, like, how I would evaluate the solidness of  
22 research. And it's the thing that I do every  
23 single day, you know, teaching my students, but  
24 also as -- you know, on editorial boards of  
25 journals or doing peer-reviewed research.



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 128

1 DR. LINDSEY CAMERON

2 Q. And so are you holding  
3 Mr. Okapaku to a standard that would apply to  
4 academic research?

5 MS. POLLOCK: Object to form.

6 THE WITNESS: That's an  
7 interesting question and I would say not  
8 quite, because I've seen good expert  
9 reports from people who don't have PhDs.

10 And so I do not feel the quality  
11 of Joseph Okpaku's work was at that  
12 level.

13 BY MR. WYATT:

14 Q. Okay. But you're not aware of  
15 what the standard is for the admissibility of  
16 expert testimony in a court of law, correct?

17 A. No. Actually, I'm not. No.

18 Q. Okay.

19 And do you know -- are you aware  
20 that one of the issues that may come up in  
21 these cases is whether it relates to the legal  
22 question of control?

23 A. I think that will come up.

24 Q. And do you think it would be  
25 helpful in understanding the answer to that

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 129

1 DR. LINDSEY CAMERON

2 question to have a law degree?

3 MS. POLLOCK: Object to form.

4 THE WITNESS: I can't answer  
5 that question.

6 BY MR. WYATT:

7 Q. Fair enough.

8 A. Because control is defined  
9 differently in different disciplines. I don't  
10 know how conclusions are made in a court of  
11 law.

12 Q. Is that something that you  
13 evaluated in your research, is how control  
14 specifically is defined differently in  
15 different disciplines?

16 A. No.

17 Q. Does it come up in the research  
18 that you do?

19 I mean, do you ever read a --  
20 something in literature and say, they're really  
21 not using control the way that I think -- I  
22 think about it?

23 MS. POLLOCK: Object to form.

24 THE WITNESS: No. I mean, in my  
25 reports, I try to be very explicit.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 130

1 DR. LINDSEY CAMERON

2 I'm using it from an  
3 organizational lens.

4 BY MR. WYATT:

5 Q. Do you do a lot of reading in  
6 your field such that you encounter sort of  
7 other fields' approaches to concepts that you,  
8 you know, kind of focus on in your own academic  
9 work?

10 A. Sorry.

11 I wasn't -- I wasn't quite done.

12 Q. I'm sorry. Go ahead, please.

13 A. But my thought was going along  
14 your line of questions. But there is a paper  
15 where I talk about consent, and I do have a  
16 discussion, how do you think about consent from  
17 sociological perspective, a legal perspective,  
18 an ethics perspective, a psychological  
19 perspective.

20 So I do think about them and I  
21 use them to inform my organizational theory,  
22 but I don't say this is right or this is wrong.

23 Q. Okay. So are you -- are you  
24 addressing the methodology that Mr. Okapaku  
25 used in his report or something else?

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 131

1 DR. LINDSEY CAMERON

2 MS. POLLOCK: Object to form.

3 THE WITNESS: I'm objecting  
4 to -- I mean, there -- I have issues with  
5 many things in Okpaku's report. It's not  
6 just the methodology.

7 BY MR. WYATT:

8 Q. Okay. And we'll look at -- your  
9 summary, I think, raises some of those things,  
10 and so maybe that's the best way to talk  
11 through it, but if there's other things that we  
12 don't cover that you think are important,  
13 please let me know.

14 Turning to Paragraph 15, for  
15 example, you start with, "Because it depends so  
16 heavily on anecdotal information and lacks  
17 rigorous analytical methodology, his report  
18 lacks accuracy, validity and generalizability."

19 Do you see that?

20 A. Correct.

21 Q. And what's the anecdotal  
22 information you're referring to here?

23 A. Oh, there's one section where he  
24 says, there was a summer I was in Washington,  
25 D.C. and saw -- I think there was a government

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 132

1 DR. LINDSEY CAMERON

2 shutdown or the metro was not working, and I  
3 saw a lot of people driving from ride-hailing  
4 and there's another example where he's, like,  
5 and I met a teacher who drove for Lyft during  
6 her summer breaks.

7 And it's -- I mean, it's not --  
8 it's not even journalist, like, journalists  
9 look at qualitative data and sort of build up  
10 inferences. You don't even have to do academic  
11 research at the rigor I am, but there is a way  
12 of which it almost felt like he was  
13 cherry-picking a few personal examples from his  
14 life and putting it into the report, and that,  
15 to me, didn't feel rigorous.

16 Q. And you would not characterize,  
17 I take it, like, a structured interview of the  
18 driver as anecdotal information or would you?

19 I don't know.

20 MS. POLLOCK: Object to form.

21 THE WITNESS: So to give a full  
22 answer, a structure -- I don't do  
23 structured interviews. I do  
24 semi-structured interviews.

25 BY MR. WYATT:

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 133

1 DR. LINDSEY CAMERON

2 Q. Okay.

3 A. And a semi-structured interview  
4 has a question behind it and you're  
5 interviewing more than one person. You're  
6 interviewing, you know, a group of people that  
7 have been theoretically sampled for a  
8 particular reason to answer a research  
9 question.

10 And you're often collecting data  
11 from multiple sources, maybe you're getting  
12 archival data or you're working on the job or  
13 you're interviewing people at different levels  
14 in the organization.

15 So that's not -- anecdotal is,  
16 like, I talked to my barber down the street,  
17 which is quite -- there's no interview  
18 protocol. There's no research question.  
19 There's no multiple sources of data. They're  
20 quite -- they're quite different.

21 Q. And so a couple questions about  
22 that. You mentioned that there would be a  
23 group of people that have been theoretically  
24 sampled for a particular reason.

25 What does theoretically sampled

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 134

1 DR. LINDSEY CAMERON

2 mean?

3 A. So theoretical sampling, I'll  
4 probably try to describe abstractly and then  
5 more specific.

6 It's, like, you have a research  
7 question about X and in the beginning, X can be  
8 very vague. And so you're talking to people,  
9 you're -- you're interviewing people, you're  
10 collecting archival data, maybe you're -- you  
11 know, looking at maybe getting some other type  
12 of digital data, maybe like digital-trace data.

13 And as you're thinking, okay,  
14 the question is no longer X, the question I  
15 think I'm really interested in is X prime. So  
16 now I'm going to look for things that are  
17 related to X prime.

18 So there's, like, a narrowing of  
19 your research question and you might only now  
20 interview people who are X prime people,  
21 because that matches to what the theory is, so  
22 that's not clear.

23 I can give you an empirical  
24 example, but that's what theoretical sampling  
25 is.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 135

1 DR. LINDSEY CAMERON

2 Q. No I think that's clear enough  
3 for me to ask my next question, which is, is  
4 this different from random sampling as one  
5 would do in quantitative research?

6 A. Yes.

7 It is the complete opposite.

8 I just taught my PhD class on  
9 this yesterday. Yes. There's two different  
10 motivations that go behind sampling happens of  
11 qualitative versus quantitative.

12 Quantitative will -- can either,  
13 one, do a representative sample, like, if  
14 you're doing a national survey or can be  
15 random, for example, like RCT, a random control  
16 trial, that's because quantitative research  
17 cares about the average.

18 Qualitative research cares about  
19 variance. And so because of that, you do the  
20 theoretical sampling that I talked about.

21 Q. That makes sense, but then  
22 aren't there challenges to extrapolating from a  
23 qualitative sample to a broad population?

24 A. That's where your theorizing  
25 comes in, is can you -- the claims of knowledge



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Page 136

1 DR. LINDSEY CAMERON  
2 that you make are different from -- from  
3 quantitative research versus qualitative.

4 Quantitative research is good  
5 if -- if I need to get my knee replaced, will  
6 this knee replacement work? Qualitative  
7 research is about how systems and  
8 organizational processes unfold.

9 So it's more about how  
10 mechanisms and the lie of how something  
11 happens. So it's just different knowledge  
12 claims that you're making.

13 Q. I think I understand that, but  
14 if we want to know, say, whether drivers in  
15 general feel controlled by gamification, to  
16 take an example, wouldn't we have to do a  
17 quantitative analysis of that to know the  
18 answer?

19 MS. POLLOCK: Object to form.

20 THE WITNESS: No.

21 I mean, there are many papers  
22 that talk about this that use qualitative  
23 research that are peer-reviewed that have  
24 won awards, including my own research.

25 BY MR. WYATT:

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Page 137

1 DR. LINDSEY CAMERON

2 Q. Well, does your research make  
3 claims, though, about sort of what drivers  
4 generally experience?

5 MS. POLLOCK: Object to form.

6 THE WITNESS: One of my papers,  
7 so I'm thinking about the one about  
8 workplace games and workplace games are  
9 different from gamification and we could  
10 have a conversation about that if that  
11 becomes important.

12 I argue how workplace games are  
13 a form of control and keep people  
14 embedded in their work, and I mean, I am  
15 not the only person that's come to this  
16 conclusion.

17 I mean, Burawoy has, Salis has,  
18 Rachel Sherman, I mean, there's at  
19 least -- there are a lot of people who  
20 have made similar claims and often from  
21 qualitative data.

22 BY MR. WYATT:

23 Q. Are the claims in your report  
24 generalizable?

25 MS. POLLOCK: Object to form.

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Page 138

1 DR. LINDSEY CAMERON

2 THE WITNESS: I would say yes,  
3 they're generalizable.

4 So one of the hallmarks about  
5 qualitative research, if you're trying to  
6 speak to theory and it's very abstract,  
7 is generalizable.

8 And there is -- there are tables  
9 that I use in my doctoral class that has  
10 these words that you think about, what  
11 does generalizable mean from a  
12 quantitative perspective versus what does  
13 generalizability mean in a qualitative,  
14 so the same word will have different  
15 meanings depending on your methods.

16 But, yes, my research is  
17 considered generalizable, but I also  
18 think beyond the fact that just the fact  
19 that it's peer-reviewed and won a bunch  
20 of awards, there are multiple people who  
21 have found this exact same finding, like,  
22 not even just in ride-hailing, though  
23 that is -- (inaudible) -- 2019, and  
24 Vanderbrand and Chan, 2022, have all  
25 found control being linked to gains in

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 139

1 DR. LINDSEY CAMERON

2 ride-hailing.

3 But people have found this exact  
4 same phenomenon in lawyers, for example,  
5 or factory workers. So when you have  
6 multiple people finding the exact same  
7 finding in multiple -- the same research  
8 cite and multiple research sites, that  
9 signals generalizability.

10 BY MR. WYATT:

11 Q. Okay. So let's go back to your  
12 dissertation for a second. And this is on  
13 Page 99, it's limitations and future research.

14 Do you see that?

15 A. Right.

16 Q. And you write, "Several of the  
17 study's limitations provide opportunities for  
18 future research. You note that participants  
19 were predominantly men and all were living in  
20 North America. And future research could  
21 explore the transferability of the model to  
22 contexts with different gender and cultural  
23 compositions", right?

24 A. Yes.

25 Q. And so is this a statement that

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 140

1 DR. LINDSEY CAMERON  
2 at least the dissertation was limited, in terms  
3 of its generalizability?

4 A. This is being taken out of  
5 context, because I don't know what study we're  
6 talking about and we were just talking about  
7 workplace games, and I -- I talked about how  
8 the workplace games concept is transferable to  
9 all these different sites.

10 So this is -- what -- what is --  
11 what is a research question I'm trying to  
12 answer? It has to be tighter. You know, what  
13 I mentioned earlier, like, this -- you know,  
14 it's a dissertation, so it's more abstract, can  
15 see, how does this fit in other settings?

16 So I don't know what the  
17 research question is. I'm not sure what the  
18 right other settings are.

19 Q. Okay. This is from your  
20 dissertation, right?

21 A. Right. But it says this study.  
22 I don't know what -- there's -- it's a  
23 two-study dissertation and actually games was  
24 not part of this dissertation at this stage.

25 So this -- I feel like this is

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 141

1 DR. LINDSEY CAMERON  
2 just taking -- it's not a fair comparison when  
3 you were asking me for about games and  
4 generalizability and then pulling out this one  
5 sentence from an older piece of research.

6 Q. And I didn't mean -- I didn't  
7 mean to focus on games, but my question was  
8 whether -- was more focused on whether this is  
9 a statement about this type of research in  
10 general, qualitative research, or if it's just  
11 limited to whatever was discussed in this  
12 dissertation.

13 A. Say that one more time?

14 Q. Yeah. Is this limitation about,  
15 you know, what I said is generalizability, is  
16 that applicable to qualitative research in  
17 general or is this specific to the  
18 dissertation?

19 MS. POLLOCK: Object to form.

20 THE WITNESS: I don't think I  
21 quite am following the question.

22 BY MR. WYATT:

23 Q. Well, let me -- let me try a  
24 different document.

25 Hold on a second.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 142

1 DR. LINDSEY CAMERON

2 Let's do this.

3 MR. WYATT: This will be  
4 Exhibit 10.

5 - - -

6 (Whereupon the document was  
7 marked, for identification purposes, as  
8 Exhibit Number 10.)

9 - - -

10 MR. WYATT: Let's open it up on  
11 the screen.

12 BY MR. WYATT:

13 Q. Do you see this article on the  
14 screen?

15 A. Yes.

16 Q. And this is an article that  
17 you're a coauthor of, right?

18 A. Exactly.

19 Q. 2023, Algorithmic -- Algorithmic  
20 Management: Its Implications for Information  
21 Systems Research?

22 A. Uh-huh.

23 Q. And --

24 A. I just want to note that  
25 Manuscript ID says.R1, I'm not sure if that's

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 143

1 DR. LINDSEY CAMERON

2 the final version, because R1 usually implies  
3 it's a revision.

4 Q. Okay. And I think that's fine.  
5 It does say for review only, so maybe this is  
6 not the final version?

7 A. Uh-huh.

8 Q. But I will want to ask you some  
9 questions about it, so just give me a second.  
10 Let's see.

11 Okay. Do you see this  
12 conclusion, key takeaways for information  
13 systems research?

14 A. Yes.

15 Q. Okay. And then if we go down  
16 toward the bottom, it says, "Future research  
17 from an IS perspective", and does that mean an  
18 information systems' perspective?

19 A. Yes.

20 Q. Okay. "May therefore continue  
21 to use qualitative methods such as ethnography  
22 and discourse analysis of online communities."

23 Do you see that?

24 A. Yes.

25 Q. And then, it says, "They're also



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 144

1 DR. LINDSEY CAMERON

2 suitable to study among those developing or  
3 implementing algorithmic management", which is  
4 what we've been talking about, right?

5 A. Yes.

6 Q. And then while many examine  
7 algorithmic management from a worker  
8 perspective, we also see the need to adopt from  
9 a managerial perspective, right?

10 A. Yes.

11 Q. "Specifically, in-depth  
12 qualitative accounts of how managers respond to  
13 the introduction of algorithmic management and  
14 the act on algorithm-based insights are key."

15 A. Yes.

16 Q. And then it says, "At the same  
17 time, such methods face limitations, including  
18 generalizability."

19 A. Uh-huh.

20 Q. Isn't that saying that  
21 qualitative research has limitations, including  
22 generalizability?

23 A. That is what that sentence says.  
24 I did not write that sentence.

25 Q. Okay.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 145

1 DR. LINDSEY CAMERON

2 A. I think you saw there was six or  
3 seven co-authors there.

4 Q. I did.

5 So do you agree with that  
6 statement?

7 A. When you're thinking about  
8 generalizability, I do believe you're  
9 describing it -- the way you're asking, is it  
10 representative of all people?

11 That's not how I understand  
12 generalizability to mean from a qualitative  
13 perspective.

14 So generalizability, to me, is,  
15 is it a general process that can be replicated  
16 in other contexts? Yes, I think that's what  
17 qualitative research is good at.

18 Will there be a mechanism that  
19 might change? For example, the way I find that  
20 workplace games are created in ride-hailing is  
21 actually different a bit than how lawyers do  
22 workplace games.

23 But in my mind that is still  
24 generalizable even if, like, all the -- it's  
25 almost like A leads to B leads to C, that's

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 146

1 DR. LINDSEY CAMERON

2 what generalizable.

3 But A prime, B prime, some of  
4 the distinctions may not be exactly the same  
5 and that's what quantitative research is good  
6 at.

7 So if you're going to push me  
8 on, like, generalizability, does it transfer  
9 exactly the same across contexts? I'd be like  
10 well, no, that's not generalizable, but I don't  
11 hold generalizability to that same standard  
12 because that's a quantitative standard, I hold  
13 it to a qualitative standard.

14 Q. Okay. Okay. That's helpful,  
15 thanks. Let me ask you about reliability.

16 Is reliability a concept that  
17 applies to qualitative research?

18 A. It does.

19 Q. And how -- how does it apply?

20 A. So I am not going to remember  
21 right now, off the top of my head, but I  
22 believe what -- okay. Let me take that back.

23 I think reliability is the work  
24 of quantitative research.

25 Like, I have -- I have a whole

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 147

1 DR. LINDSEY CAMERON

2 deck where I say, these are the words in  
3 quantitative research and it's what they  
4 translate to qualitative research.

5 I think reliability is a  
6 quantitative word that we actually -- we use to  
7 be triangulation in qualitative research.

8 Q. Okay. And what does  
9 triangulation entail?

10 A. Triangulation is, can you get  
11 the same piece of data -- and by data, I don't  
12 mean, like, the same word, but like the same  
13 concept, the same theme from multiple sources.

14 So can you get it from  
15 observation and archival and from interviews  
16 about a game? It's not as if -- reliability  
17 would be, like, could somebody else look at my  
18 same data set and produce the same results, and  
19 that's not qualitative, that's a quantitative  
20 approach.

21 So I believe -- and quantitative  
22 research, I think the right translation is  
23 triangulation.

24 Q. Okay.

25 And is reproducibility not a

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 148

1 DR. LINDSEY CAMERON

2 focus of qualitative research?

3 A. No. Not so much.

4 Q. And why is that?

5 A. Because -- so there's different  
6 perspectives in qualitative research.

7 There's a -- it goes all the way  
8 from interpretive to positive. A positive is  
9 would have a belief that it should be  
10 replicable, like, someone else should be able  
11 to look at my data, be able to do counts of how  
12 many times somebody uses a positive -- word,  
13 and put that in a progression model, that's the  
14 minority of qualitative research and that's not  
15 what I do.

16 The interpretivist is social  
17 construction of knowledge, and so that is, that  
18 one person could look at my dataset and they  
19 could write an article about, I don't know,  
20 odor work or the feminization of gig work and,  
21 I'll write something about control.

22 But even though we have  
23 different perspectives, one of the things that  
24 gives the research rigor and validity is the --  
25 you know, I talked about those six parts, is

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 149

1 DR. LINDSEY CAMERON  
2 the data heterogeneous, is it palatable, et  
3 cetera, but also the fact that my findings have  
4 been sort of bound by other researchers and  
5 other disciplines shows there's rigor in a type  
6 of research that is more socially constructed.

7 Q. Okay. Let's go back to your  
8 report. So we're continuing through the  
9 summary of rebuttal points and we're at  
10 Paragraph 16. And you write, the name of  
11 the -- well, actually let's back up.

12 End of paragraph, you say; "a  
13 "few of these mistakes', referring to mistakes  
14 made by Mr. Okapaku, are discussed as follows."

15 So that brings 16, which starts,  
16 "The name of the industry is ride-hailing, not  
17 ridesharing."

18 Do you see that?

19 A. Correct.

20 Q. And then you go on and say, this  
21 is one of the mistakes -- let me find the  
22 language. Oh, I'm sorry. I'm looking at the  
23 wrong thing.

24 "Common for those with a  
25 superficial understanding of the industry",

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 150

1 DR. LINDSEY CAMERON

2 correct?

3 A. Correct.

4 Q. You understand that the term  
5 ridesharing is widely used to describe rides  
6 obtained with Uber or Lyft, correct?

7 A. A lot of people have a  
8 superficial understanding.

9 Q. Okay. Well, I mean, is this  
10 just a disagreement of terminology or just most  
11 people are just wrong about this?

12 MS. POLLOCK: Object to form.

13 THE WITNESS: I honestly believe  
14 that most people are wrong, because if  
15 you look at the origin of what the  
16 sharing economy means, that's actually  
17 not what Uber is actually doing.

18 I do see it as a form of  
19 greenwashing, of using this word sharing  
20 that implies some sort of social  
21 reciprocity like a time bank, which is  
22 really not what Uber is not based off of.

23 And, you know, Alex Black talks  
24 about this more in her book, so I would  
25 recommend -- like, I've not written a

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 151

1 DR. LINDSEY CAMERON  
2 paper about this explicitly, but I think  
3 in her book, from the best I can  
4 remember, she talks about how this was a  
5 purposeful phrase used as Uber grew to  
6 sort of, you know, make it seem more  
7 friendly and appealing and more, like,  
8 you know, peer-to-peer, like, you're  
9 getting into a car with, like, your  
10 cousin or something like that.

11 She describes it as, like, a  
12 purposeful choice by the company, to use  
13 the word sharing as opposed to hailing or  
14 something else.

15 BY MR. WYATT:

16 Q. But let me ask you this, I mean  
17 do you think that Mr. Okapaku has only a  
18 superficial understanding of the industry,  
19 whether it's called ride-hailing or  
20 ridesharing?

21 MS. POLLOCK: Object to form.

22 THE WITNESS: It's a good --  
23 that's a really good question.

24 Instead of -- I -- I still -- I  
25 think I still agree with the word



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 152

1 DR. LINDSEY CAMERON  
2 superficial, but there's a way in which  
3 his perspective was not critical.

4 It's almost like there's --  
5 there's a veneer in how the company --  
6 any company wants to present itself.

7 And Mr. Okapaku was very much  
8 repeating the veneer, which, to me,  
9 felt -- like, a superficial engagement  
10 of, you know, he -- he lists -- I spoke  
11 at Aspen, I spoke at all these big events  
12 and I read all this academic research and  
13 I've done this for years, and that  
14 supposed knowledge of studying the  
15 industry in depth and being an insider  
16 was not -- it wasn't relevant in his  
17 report.

18 It didn't show -- I threw in his  
19 report because there was a veneer, a  
20 superficial level of understanding that  
21 was expressed in the report.

22 BY MR. WYATT:

23 Q. And I mean, so you're aware that  
24 Mr. Okapaku worked at Lyft for five and a half  
25 years, correct?

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 153

1 DR. LINDSEY CAMERON

2 A. I thought it was -- it was Lyft,  
3 right? Yes.

4 Q. Yeah.

5 A. That -- yes. I'm aware that,  
6 and there's a level of critical -- like,  
7 critical thinking that I did not see evident in  
8 that report.

9 Q. And did you know that he  
10 worked -- he sort of had a direct hand in  
11 helping develop legislation in several states  
12 that govern ridesharing or ride-hailing?

13 A. Yes.

14 I remember him writing that.

15 Q. Okay. But nevertheless, you  
16 stand on your claim that he has only a  
17 superficial understanding of the ride-hailing  
18 industry?

19 MS. POLLOCK: Objection.

20 Argumentative.

21 THE WITNESS: So what I think my  
22 express wording was that he expressed  
23 only a superficial understanding in his  
24 report.

25 His actual understanding might

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 154

1 DR. LINDSEY CAMERON

2 be different, that's what I saw in the  
3 report, is I did not see critical  
4 thinking in that report.

5 Like, a -- I didn't -- yeah.

6 I -- the -- from -- from using  
7 the anecdotal evidence about the time  
8 where I talked to a teacher and she was  
9 working over the summer, to using the  
10 word ridesharing, to the reports he was  
11 reciting, it didn't -- the level of  
12 sophistication in the report didn't match  
13 what I would have expected someone with  
14 his insight and experience to have.

15 BY MR. WYATT:

16 Q. In your view, does anything  
17 about, you know, his expertise turn on whether  
18 he uses the term ridesharing or ride-hailing?

19 A. I mean that --

20 MS. POLLOCK: Object to form.

21 It calls for a legal conclusion.

22 THE WITNESS: Say that question  
23 one more time? Sorry.

24 BY MR. WYATT:

25 Q. Is part of your critique of

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 155

1 DR. LINDSEY CAMERON

2 Mr. Okapaku's ability to offer an opinion on  
3 these issues turn on his use of the term  
4 ridesharing or ride-hailing?

5 A. That was just one of many things  
6 that I saw in the report. That's not, like,  
7 the lynch pin of using the word ridesharing as  
8 opposed to ride-hailing.

9 Q. Okay. And in fact, you've used  
10 the word ridesharing in your only published  
11 work, is that correct?

12 A. I may have made that mistake  
13 very early on.

14 Q. But you've changed your mind  
15 since then?

16 A. Yes. Yeah. I'm an academic.  
17 This is -- this is what I think  
18 about all the time. My thoughts do evolve and  
19 change.

20 Because when you really do try  
21 to understand what the sharing economy is  
22 about, you do realize that's not actually what  
23 most of the economies do. They're not having  
24 the same ethos as the sharing economy.

25 Q. Let me show you one article.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 156

1 DR. LINDSEY CAMERON

2 MS. POLLOCK: We've been going  
3 an hour. I don't know if now is a good  
4 time for a break or after you get through  
5 this document?

6 MR. WYATT: Let's just do this  
7 document, because it will close out this  
8 topic of ridesharing versus ride-hailing  
9 and it will only take, like, two minutes,  
10 if that works for you?

11 MS. POLLOCK: Okay.

12 - - -

13 (Whereupon the document was  
14 marked, for identification purposes, as  
15 Exhibit Number 11.)

16 - - -

17 MR. WYATT: All right. So I'm  
18 introducing what is Exhibit 11.

19 BY MR. WYATT:

20 Q. I'm going to say it's going to  
21 take two minutes, but I have not yet mastered  
22 the introductions exhibits, so it takes less  
23 than two minutes just to introduce it, but here  
24 we are.

25 Do you recognize -- this is on

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 157

1 DR. LINDSEY CAMERON

2 the screen -- this article?

3 A. Yes.

4 Q. Okay. And the title -- you see  
5 the title, Ridesharing Services, we don't need  
6 to belabor it, but this is an article that uses  
7 that term, correct?

8 A. Yes. It was an earlier article  
9 that I've written in 2008 with -- the  
10 co-authors in another academic discipline,  
11 you'll see I'm the first author.

12 But I'm not actually sure the --  
13 the field was still trying to figure out, is it  
14 ridesharing or is it ride-hailing too at the  
15 time we were writing that.

16 Q. And to be clear, this is 2018,  
17 correct, not 2008?

18 A. Yeah. Sorry if I misspoke.  
19 2018.

20 Q. Okay. Do you know if these  
21 authors, your co-authors, still use the term,  
22 ridesharing?

23 A. No. I don't know.

24 Q. Do you still work with these  
25 folks on other academic projects?

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 158

1 DR. LINDSEY CAMERON

2 A. No. I don't.

3 Q. Okay.

4 MR. WYATT: Okay. Yeah.

5 Why don't we stop right there  
6 and take a break?

7 THE WITNESS: Okay.

8 THE VIDEOGRAPHER: Going off the  
9 video record. The time is 4:49 p.m.

10 - - -

11 (Whereupon, a recess took place  
12 from 4:49 p.m. to 5:04 p.m.).

13 - - -

14 THE VIDEOGRAPHER: We are back  
15 on the video record. The time is  
16 5:04 p.m.

17 This begins Media Unit Number 3.

18 BY MR. WYATT:

19 Q. Welcome back, Dr. Cameron.

20 We were talking about the  
21 summary in your report of -- rebuttal to  
22 Mr. Okapaku and we left off at Paragraph 16.

23 Do you remember that?

24 A. Yes.

25 Q. So let me put the report back on

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 159

1 DR. LINDSEY CAMERON

2 the screen. And moving on to Paragraph 17, you  
3 write, "Another example of Okpaku's inaccuracy  
4 is that the word, control, a key concept in  
5 this case, is not defined in his report."

6 Do you see that?

7 A. Yes.

8 Q. What is your understanding of  
9 why control is a key concept in this case?

10 A. Because it was a lot of the  
11 conversations that I had with Jo Anne was about  
12 control.

13 Q. And you say it is quite common,  
14 further down, right here, "This  
15 misunderstanding of control is quite common for  
16 those with a surface-level understanding of the  
17 on-demand economy", right?

18 A. Correct.

19 Q. And similar to the questions we  
20 discussed previously, notwithstanding the fact  
21 that Mr. Okapaku worked for Lyft for five and a  
22 half years, your opinion is that he has a  
23 surface-level understanding of the on-demand  
24 economy, correct?

25 A. My opinion is that he expressed



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 160

1 DR. LINDSEY CAMERON

2 a surface-level understanding, because he used  
3 the word control, almost in a colloquial way,  
4 not in a -- a way that actually had rigor or  
5 teeth around it.

6 I was surprised, to be honest,  
7 given his amount of expertise or working in the  
8 gig economy to see that in his report.

9 Q. And part of what you're saying  
10 here is part of the way he talks about control  
11 is quite a common way for people to talk about  
12 control.

13 Is that correct?

14 A. It's a common -- a common way  
15 for those with a superficial understanding,  
16 like, the general public will think, oh,  
17 ride-hailing drivers have control because they  
18 can chose when they went to work.

19 Take aside the point of whether  
20 or not they actually have choice when they want  
21 to work, really what they're talking about is  
22 schedule flexibility. So there's, like, a  
23 slippage in terms of the concept.

24 And I do think many people have  
25 a slippage of understanding what's really

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 161

1 DR. LINDSEY CAMERON

2 happening in this form of work and use words  
3 that are inaccurate.

4 Q. And what's the definition of  
5 control that you use in your report?

6 A. We have to go through the report  
7 to find which paragraph, but I know I define  
8 it.

9 Q. Yeah. Let me try to shortcut  
10 it. Let me fast forward and you can tell me if  
11 this is right or not.

12 Would this be where it is, how  
13 organizational scholars define organizational  
14 control and its importance?

15 A. Yes.

16 It would be in that section.

17 Q. Okay. And down here in  
18 Paragraph 36, it says, "In the management and  
19 organizational literature, organizational  
20 control is defined as any process that aligns  
21 an individual worker's capabilities,  
22 activities, and performance with the  
23 organization's goals and aspirations", correct?

24 A. Correct.

25 Q. And is that the definition that

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 162

1 DR. LINDSEY CAMERON

2 is your operating definition in this report?

3 A. It is.

4 Q. Okay. Is it your view that how  
5 organizational scholars define organizational  
6 control is the relevant definition of control  
7 for this case?

8 A. I can't --

9 MS. POLLOCK: Object to form.

10 THE WITNESS: -- oh, I can't  
11 answer that question.

12 BY MR. WYATT:

13 Q. Okay.

14 MR. WYATT: And I'll close down  
15 and introduce a new exhibit.

16 - - -

17 (Whereupon the document was  
18 marked, for identification purposes, as  
19 Exhibit Number 12.)

20 - - -

21 MR. WYATT: This will be  
22 Exhibit 12 and I'll put it on the screen.  
23 This is the report of Mr. Okapaku.

24 BY MR. WYATT:

25 Q. And you've seen this before,

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 163

1 DR. LINDSEY CAMERON

2 correct?

3 A. Can you scroll down a little  
4 bit?

5 Q. Yeah.

6 A. Yes.

7 Q. Okay. And if we go to Page 29  
8 of his report, he has this concluding  
9 paragraph, "For all of the above reasons, it is  
10 my opinion that drivers have significant  
11 control over the amount of their participation  
12 on the Uber app, and that Uber does not  
13 exercise control over drivers".

14 Do you see that?

15 A. Yes.

16 Q. And he's not mentioning  
17 organizational control, correct?

18 A. Correct.

19 Q. And he's also talking about --

20 A. Wait. That's not true.

21 Uber does not exercise control  
22 over its drivers. To me, that sounds like  
23 organizational control, even though he's not  
24 using the word organizational in front.

25 Q. Okay.

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Page 164

1 DR. LINDSEY CAMERON

2 But he's not using the word  
3 organizational, correct?

4 A. Correct.

5 Q. And he -- he is talking also  
6 about the amount of control that drivers have,  
7 correct?

8 A. True. He's using the word  
9 control in two different ways in the same  
10 sentence.

11 Q. And what is the way that you  
12 would think about the control that drivers  
13 assert, from your perspective?

14 MS. POLLOCK: Object to form.

15 BY MR. WYATT:

16 Q. If any?

17 A. It's different in every article,  
18 to be honest, because it depends on how I'm  
19 trying to theorize it.

20 So when you think of my  
21 2024 ASQ, which is probably my most famous  
22 work, I think of it in terms of consent and  
23 I -- I define it as, like, engagement tactics  
24 or deviant tactics with the work, and those are  
25 both examples that people have in choice of the

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 165

1 DR. LINDSEY CAMERON

2 algorithmic management system.

3 Q. Okay.

4 A. I try not to do what Mr. Okapaku  
5 has done, which uses the same word two  
6 different ways in the same sentence because  
7 that's unclear and imprecise.

8 But the way the choices that  
9 drivers have, I theorize that in different ways  
10 in my research.

11 Q. And that's probably a little bit  
12 of my question, which is, you wouldn't use the  
13 term organizational control in describing the  
14 amount of control that drivers have, however  
15 you would describe that, correct?

16 A. You used the word control twice  
17 in the same sentence, but I do agree with the  
18 essence of your question.

19 It's not organizational control  
20 is what's done by the organization. The amount  
21 of choice that the workers have is something  
22 different.

23 Q. And is that how you would refer  
24 to it for the drivers' side is choice?

25 A. Each -- is different, depending

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 166

1 DR. LINDSEY CAMERON

2 on what I'm trying to theorize.

3 Q. I see that. You said that.

4 Okay. I understand that.

5 But choice would be one concept  
6 that you use in papers previously?

7 A. Yes.

8 Q. Okay. And I mean, do you agree  
9 that drivers have significant control over the  
10 amount of their participation on the app?

11 MS. POLLOCK: Object to form.

12 THE WITNESS: That's  
13 interesting.

14 I think it really depends on  
15 how -- because the -- the language is a  
16 bit imprecise. It depends on how you  
17 want to define it.

18 If he is trying to say, amount  
19 of participation equals when I sign up  
20 for the app or when I sign on, I would  
21 say people do have a fair amount of  
22 choice in choosing when they're going to  
23 sign on. There's influence, but I would  
24 say they have more choice.

25 If you're talking about what

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 167

1 DR. LINDSEY CAMERON

2 actually happens when you're logged into  
3 the app, then I would disagree with that  
4 part of the sentence.

5 BY MR. WYATT:

6 Q. And what's that based on, the  
7 disagreement with -- the part when you're  
8 logged in?

9 A. Well, that's most of my  
10 research, that talks about once you're logged  
11 in, you're under the algorithmic management and  
12 its control system.

13 So from that, what he's written  
14 is actually not clear to me what he's referring  
15 to.

16 Q. Well, do you agree that drivers  
17 have choice as to when to log out of the app,  
18 once they're logged in?

19 MS. POLLOCK: Object to form.

20 THE WITNESS: I would say, you  
21 know, for the most part, yes. I mean,  
22 people declining on multiple rides in a  
23 row, they're asked to leave the app,  
24 they're logged off.

25 So it's not a full unequivocal



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 168

1 DR. LINDSEY CAMERON

2 yes, but I would say that people do have  
3 more choice in choosing when to log in  
4 and when to exit the app.

5 BY MR. WYATT:

6 Q. Okay. And if they're logged off  
7 because of multiple denials, they can log back  
8 in, right?

9 A. I'm not entirely sure.

10 I don't think that's true.

11 Let me -- that.

12 In times of doing my research,  
13 that has not been true. I don't know what is  
14 true at this moment, but I do believe -- I  
15 think it's my 2024 ASQ, I talk about people who  
16 did not -- you know, cut off multiple rides in  
17 a row and then were locked out of the app for a  
18 period of time and that's, you know, other  
19 people have talked about that.

20 So my question -- and by other  
21 people, I mean other researchers. So what I'm  
22 trying to say is, no, I don't believe that  
23 people have always just been able to log back  
24 in if they've been logged out.

25 Q. Okay.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 169

1 DR. LINDSEY CAMERON

2 And do you know whether that was  
3 true on the Uber platform or the Lyft platform  
4 or both?

5 A. I can't remember off the top of  
6 my head. No.

7 Q. Okay. Let me put your report  
8 back up. And we're still on Paragraph 17 where  
9 we're talking about the definition of control.

10 And further down, you write,  
11 "Even if we were to exchange the word Okpaku  
12 uses, control, with the more accurate word,  
13 temporal flexibility, I will argue that  
14 workers' temporal flexibility is quite  
15 limited."

16 Do you see that?

17 A. Correct.

18 Q. And that is different from what  
19 you have said about flexibility in the past,  
20 correct?

21 MS. POLLOCK: Object to form.

22 THE WITNESS: I don't know.

23 BY MR. WYATT:

24 Q. Well, earlier we saw your  
25 testimony from 2021 where you highlighted

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 170

1 DR. LINDSEY CAMERON  
2 flexibility as one of the virtues of driving on  
3 the platform, correct?

4 MS. POLLOCK: Object to form.

5 THE WITNESS: I think I would  
6 need to see both pieces side by side to  
7 be able to give you a -- a -- an  
8 appropriate answer.

9 BY MR. WYATT:

10 Q. Okay.

11 A. Because -- because I would also  
12 want to note in that sentence, I don't think  
13 you read the whole sentence and there was,  
14 like, a caveat that was in parentheses, so I  
15 also want to make sure we get the full meaning  
16 of what was meant behind that sentence.

17 Q. So I think it gets back to the  
18 point you were making a minute ago, right, this  
19 second sentence, "While drivers do have choice  
20 on when to log into the app, temporal  
21 flexibility in terms of the timing of their  
22 shift, their choices are greatly limited once  
23 they are logged into the app and subject to  
24 algorithmic management and control."

25 Is that what you were referring

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 171

1 DR. LINDSEY CAMERON

2 to?

3 A. That was a follow-on sentence,  
4 yes, that I think puts that previous sentence  
5 in -- in more context.

6 Q. Okay. And so, if I can pull  
7 back up the testimony we had, in the testimony,  
8 you recall the benefits section and the  
9 challenges section.

10 A. Yes.

11 Q. And then in the benefits  
12 section, Part B was, "there are many benefits  
13 to driving."

14 And down here, "most  
15 importantly, because of the low barrier to  
16 entry and scheduling flexibility, these  
17 companies provide an opportunity for drivers to  
18 earn who may not be able or even want to secure  
19 traditional employment."

20 Do you see that?

21 A. Yes.

22 Q. And then it emphasizes, again,  
23 the flexibility of the schedule around health  
24 issues or child or elderly care, correct?

25 A. Correct.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 172

1 DR. LINDSEY CAMERON

2 Q. So do you disagree with that  
3 now, or --

4 A. No. No. Those two statements  
5 are not in contradiction with each other.

6 Q. -- okay.

7 So it is an important feature  
8 that there's scheduling flexibility, but,  
9 nevertheless, there are limitations to that  
10 once you're in the app?

11 Is that your --

12 A. Correct. There are limitations  
13 once you're in the app and other -- but I also  
14 do believe there are limits -- there are  
15 constraints around this scheduling flexibility  
16 of when you are -- sorry.

17 Let me strike that and go back.

18 Scheduling flexibility is around  
19 the timing of the shift. I'm saying there is  
20 some choice that workers have around the timing  
21 of the shift.

22 There are ways that it's being  
23 influenced by organizational control that I  
24 have talked about. That's not in -- that  
25 doesn't -- I think those are true between both

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 173

1 DR. LINDSEY CAMERON

2 documents.

3 Once you log onto the app, the  
4 amount of algorithmic management and control  
5 intensifies over workers.

6 Q. Okay. And do you think it's  
7 true that drivers can be their own boss on the  
8 Uber or Lyft platforms?

9 MS. POLLOCK: Object to form.

10 THE WITNESS: What do you mean  
11 by that?

12 Could you rephrase that?

13 BY MR. WYATT:

14 Q. Well, you note in one of your  
15 papers that studies have shown -- and I can  
16 show you the paper. I'll just pull it up.

17 MR. WYATT: Scratch the  
18 question. Hold on a second.

19 BY MR. WYATT:

20 Q. Support For Social and Capital  
21 Development -- this is the article we were  
22 looking at right before the break, right?

23 A. Yes.

24 Q. I think this is the one that  
25 talks about bowling alone, which is one of the

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 174

1 DR. LINDSEY CAMERON

2 first books I read in college, so it's a trip  
3 down memory lane for me.

4 Up here at the top of the second  
5 column, it says, "Studies that contribute  
6 insights from stakeholders, such as drivers and  
7 passengers, find that driver benefits include  
8 flexible work schedules and the opportunity to  
9 be their own boss."

10 Do you see that?

11 A. Uh-huh. Yes.

12 Q. Do you disagree with that, that  
13 drivers can be their own boss?

14 A. I believe that drivers believe  
15 they can be their own boss.

16 Q. Okay.

17 A. And the way that I'm using it  
18 here and I use it in another paper that's about  
19 to come out, I use it as a form of narrative  
20 discourse that gives workers a sense of  
21 autonomy over their work.

22 And so it -- it serves a  
23 purpose, that sort of phrase, but that's -- I  
24 mean, that's -- but that's different from  
25 whether or not I believe whether or not they

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 175

1 DR. LINDSEY CAMERON

2 are their own boss.

3 BY MR. WYATT:

4 Q. And so let's answer that  
5 question. Do you believe that they're their  
6 own boss?

7 MS. POLLOCK: Object to form.

8 THE WITNESS: I actually don't  
9 think I'm qualified to answer that  
10 question because that requires me to  
11 think about like employment status and  
12 things like that.

13 BY MR. WYATT:

14 Q. Okay. Okay. That's all the  
15 questions I have on this one.

16 Let's skip that one.

17 Are you offering an opinion  
18 about whether Uber has control over drivers  
19 under state law?

20 A. No.

21 Q. Okay. I think you said this  
22 before, but is -- is organizational control not  
23 a binary concept, as you use it?

24 A. Correct. It's not binary.

25 Q. And -- and why is that?



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 176

1 DR. LINDSEY CAMERON

2 Like, what is it instead of  
3 binary, is it like a spectrum?

4 A. It's a spectrum, but the more  
5 the way that we describe it in my literature  
6 it's a set of processes, so there's lots of  
7 different processes that can direct people's  
8 behavior like incentives or gamification.

9 Q. And do all organizations, in  
10 your view, exercise some level of control over  
11 workers?

12 A. Yes.

13 Q. Okay. Let's go back to your  
14 report. Let's go up to -- I have some  
15 questions about your methodology, which I --  
16 some of your descriptions or what I understand  
17 is your descriptions of your methodology happen  
18 in the methodology section, but some of them  
19 happen earlier, like here in Paragraph 7, so --  
20 so just tell me if that's not correct and I'll  
21 read to you -- what I specifically have a  
22 question about before I actually ask you a  
23 question.

24 So that's just a prelude.

25 You say, "My research program is

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 177

1 DR. LINDSEY CAMERON  
2 primarily qualitative and draws on the norms  
3 and standards of qualitative methodology in the  
4 organizational management field, which  
5 emphasizes in-depth immersion and observation,  
6 to see things from the experiential point of  
7 view of actors in the field", correct?

8 A. Correct.

9 Q. And is that -- I see reference  
10 methodology there, is that a fair summary of  
11 your -- your methods?

12 A. Yes.

13 MS. POLLOCK: Object to form.

14 BY MR. WYATT:

15 Q. Okay. And in the papers that  
16 you've written, are the participant analyses  
17 and the semi-structured interviews that you  
18 performed, at least part of the data that you  
19 would analyze in a qualitative method?

20 A. Not every paper has those two  
21 types of data, but that is some of the data  
22 I've used.

23 Q. Okay. Is -- is the qualitative  
24 method subjective?

25 MS. POLLOCK: Object to form.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 178

1 DR. LINDSEY CAMERON

2 THE WITNESS: All quantitative  
3 and qualitative are both subjective.

4 BY MR. WYATT:

5 Q. Okay.

6 A. It's a fallacy to think any  
7 method is objective, but there is an  
8 interpretive stance, which is a social  
9 construction of the knowledge in qualitative  
10 research.

11 Q. Okay. Help me understand the  
12 distinction between interpretive stance and  
13 subjectivity, please.

14 A. I don't think I can -- I want --  
15 I don't think they mean the same thing, but I  
16 think they are overlapping, but I couldn't,  
17 right now, off the top of my head, give you a  
18 good definition about one versus the other.

19 Q. Okay. Let's take -- suppose you  
20 and one other structural ethnographer were  
21 riding, in a ride-hailing setting and  
22 interviewing the same driver.

23 Could the two of you have  
24 different understandings of what the driver is  
25 telling you in the -- in the interview?

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Page 179

1 DR. LINDSEY CAMERON

2 MS. POLLOCK: Object to form.

3 Incomplete hypothetical.

4 THE WITNESS: So we talked about  
5 this earlier, about how at a general  
6 level, people can be at the same research  
7 setting and make two different  
8 conclusions.

9 So when you're asking the  
10 question, would we disagree about what  
11 the writer is telling us, we would all  
12 have the same words on the piece of  
13 paper, so I mean, that doesn't change.

14 Given all the other data we  
15 might have, maybe we just interview that  
16 one driver in common and we look at other  
17 drivers, we interview other people  
18 differently or have different archival  
19 data or different access to the company.

20 And depending on our research  
21 question, we might tell two different  
22 research reports, you might come to two  
23 different conclusions, but it doesn't  
24 mean one is right and one is wrong.

25 BY MR. WYATT:

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 180

1 DR. LINDSEY CAMERON

2 Q. So you could have -- as long as  
3 you had access to the same dataset, you would  
4 be working with the same data and there would  
5 be a shared understanding of what that is, but  
6 you could have different interpretations of the  
7 same data.

8 Is that what you're saying?

9 MS. POLLOCK: Object to form.

10 THE WITNESS: In a more  
11 interpretive transition.

12 So remember I talked about  
13 interpretive versus positive? A  
14 positivist, you would come up with the  
15 same conclusions, but with an  
16 interpretive standpoint, you could come  
17 to different arguments that you would  
18 develop from the data -- from a similar  
19 dataset.

20 BY MR. WYATT:

21 Q. Okay.

22 A. And I can think of one of --  
23 like, the Mann Gulch fire, I don't know if you  
24 ever heard of it, it was a big wild fire, I  
25 think, happened out west.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 181

1 DR. LINDSEY CAMERON

2 I mean, there have been six or  
3 seven different papers that have looked at the  
4 public records, I think, and interviews from  
5 that fire and it made different arguments about  
6 how people respond to organizational threats  
7 into organizing -- high-threat environments.

8 So, yes, from the same set of  
9 data you can draw -- make different  
10 conclusions.

11 Q. So -- and I think you said this  
12 earlier, but is a purpose of qualitative  
13 research to create theory?

14 A. Correct.

15 Q. Is novelty important in the  
16 field of qualitative research?

17 MS. POLLOCK: Object to form.

18 THE WITNESS: By looking at a  
19 phenomenon that's new, it helps you push  
20 to create new theory.

21 So it's not novelty for novelty  
22 sake. It's more about, how do you -- you  
23 can challenge existing sets of knowledge  
24 by looking at a phenomenon that is  
25 rapidly -- that's emerging.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 182

1 DR. LINDSEY CAMERON

2 BY MR. WYATT:

3 Q. Okay.

4 And can qualitative research be  
5 tested or is that a quantitative term?

6 MS. POLLOCK: Form.

7 THE WITNESS: We talked about  
8 this earlier and I described that it's  
9 not how one understands qualitative  
10 research.

11 BY MR. WYATT:

12 Q. Yeah. Let me see if I can skip  
13 though some of these. Hold on a second.

14 Is another way to think about  
15 qualitative research and theory creation, that  
16 it's hypothesis generating?

17 MS. POLLOCK: Object to form.

18 THE WITNESS: That's an  
19 interesting question. There is some  
20 qualitative research that's hypothesis  
21 generating. It's not the type of  
22 qualitative research I do, though.

23 BY MR. WYATT:

24 Q. Do you think grounded theory is  
25 a method of hypothesis generation?

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Page 183

1 DR. LINDSEY CAMERON

2 A. The type of -- I said I'm not  
3 familiar with the type of research that  
4 generates hypothesis. I'm not sure if they use  
5 a grounded theory technique or not.

6 Q. Okay. Sorry.

7 Just give me a second.

8 You use grounded theory as your  
9 methodology, is that correct?

10 A. Correct.

11 Q. And Glaser & Strauss, from 1967,  
12 you cite.

13 Who are Glaser & Strauss?

14 A. I believe they were  
15 anthropologists.

16 Q. Are they sort of the inventor of  
17 qualitative theory or just leaders in the  
18 field?

19 A. They're two leaders of ground  
20 theory. Not of qualitative research.

21 Q. Grounded theory.

22 Is grounded theory like a  
23 specific branch of qualitative research?

24 A. Exactly. There are many  
25 branches within qualitative research.



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 184

1 DR. LINDSEY CAMERON

2 Q. And what are some of the others?

3 A. There's one called  
4 Phenomenology, which looks at more narrative  
5 experiences. There's another one that's also,  
6 like, a narrative centered -- critical  
7 theorists that have a different way.

8 I mean, you could also look at  
9 qualitative data can be, like, content  
10 analysis, or coming up with -- of data to run  
11 then through a requestion. So there's a lot of  
12 variability in qualitative methods.

13 Q. Okay. I want to see if I  
14 understand this, so I'm going to introduce the  
15 next exhibit, 13, which I will show you in just  
16 a second.

17 - - -

18 (Whereupon the document was  
19 marked, for identification purposes, as  
20 Exhibit Number 13.)

21 - - -

22 BY MR. WYATT:

23 Q. This is an article called "What  
24 is Qualitative Research? An Overview and  
25 Guidelines."

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Page 185

1 DR. LINDSEY CAMERON

2 Do you see that?

3 A. Yes.

4 Q. Do you know who Weng Marc Lim  
5 is?

6 A. No. And I've never even heard  
7 of this journal.

8 Q. Okay. Well, I'm just going to  
9 -- it's not cited by you and I'm just going to  
10 ask you if you agree with something that says  
11 he says and explain what grounded theory is, so  
12 let me get to that page.

13 A. What field is he in?

14 Q. Let's see.

15 So if we go to this page here,  
16 he says, "Grounded theory, as proposed by its  
17 founders, Glaser & Strauss", who we were just  
18 discussing, right?

19 "Hinges on the notion that the  
20 validity of a theory is contingent upon the  
21 process of its derivation. This represents a  
22 departure from the deductive methods that start  
23 with theories to form hypothesis or  
24 propositions which are then empirically tested  
25 and verified", correct?

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 186

1 DR. LINDSEY CAMERON

2 MS. POLLOCK: Object to form.

3 THE WITNESS: I -- I -- I read  
4 those two same two sentences.

5 BY MR. WYATT:

6 Q. Is that accurate, this  
7 represents the departure from deductive methods  
8 that empirically test and verified hypothesis?

9 MS. POLLOCK: Object to form.  
10 Lack of foundation.

11 THE WITNESS: So I agree that  
12 qualitative research does not start with  
13 hypotheses and that's different from  
14 deductive.

15 I mean, I'm -- I'm -- I'm  
16 listening to see what the follow-on  
17 question is going to be.

18 BY MR. WYATT:

19 Q. Okay. So let me ask my next  
20 question, I wasn't sure if you were done  
21 answering.

22 If we go to Page 207, it says  
23 down here, "Grounded theory serves as a  
24 foundational strategy for elucidating processes  
25 and contributing to the theoretical lexicon,

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 187

1 DR. LINDSEY CAMERON  
2 focusing on theory construction, e.g.,  
3 hypothesis generation, rather than theory  
4 verification, e.g., hypothesis testing."

5 Is that correct, as far as you  
6 understand grounded theory?

7 MS. POLLOCK: Let me just remind  
8 the Witness. You have the ability to  
9 read this whole article, rather than  
10 just --

11 THE WITNESS: Right.

12 MS. POLLOCK: -- to the extent  
13 you see fit.

14 MR. WYATT: I'll object to the  
15 coaching, but you can go ahead and  
16 answer.

17 MS. POLLOCK: I object to your  
18 objection that's coaching. I'm reminding  
19 the Witness she's allowed to look at an  
20 entire document, as she sees fit.

21 THE WITNESS: So I want to  
22 say -- is -- I would need more time,  
23 because I'm -- I'm not entirely sure if  
24 you're taking things out of context in  
25 this article, because this person doesn't

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 188

1 DR. LINDSEY CAMERON  
2 look like they're in my field, because  
3 the journal is called a marketing journal  
4 and I'm not in marketing.

5 In general -- and I mean,  
6 there's a split -- he put Glaser &  
7 Strauss 1967, but there was a split  
8 between Glaser & Strauss in the early  
9 '90s.

10 You also see in my cite of that  
11 paper, I'm citing Charmaz, 2001, and  
12 Golden-Biddle and Locke of 2006, which  
13 are much closer to management theory, the  
14 way I understand it, which is not the  
15 pure definition that's used in Glaser &  
16 Strauss, both because Glaser & Strauss  
17 split in the '90s, but two, it's not the  
18 way it's done in organizational  
19 literature in the exact same way.

20 So there's a way of which I feel  
21 like there's some sort of peacemaking  
22 that's made out of turn that's making me  
23 feel uncomfortable, so I would like time  
24 to look at the article.

25 But at a general level, I would

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 189

1 DR. LINDSEY CAMERON

2 say grounded theory does help you focus  
3 on creating new theory.

4 BY MR. WYATT:

5 Q. Okay. And totally fair, you  
6 haven't read the article, but just as an  
7 abstract principle, as you understand grounded  
8 theory, from your own understanding, do you  
9 agree that it focusses on theory construction  
10 more than theory verification?

11 MS. POLLOCK: Object to form.

12 THE WITNESS: So I've said  
13 earlier before that qualitative methods  
14 is about constructing new theory, not on  
15 verifying theory, that is more what  
16 quantitative research does.

17 BY MR. WYATT:

18 Q. Okay.

19 A. And hypothesis generation is not  
20 the only way to construct theory.

21 Q. What are some other ways to  
22 construct theory?

23 A. I mean, it's -- if you read my  
24 research, they all have different examples.

25 Often it can be a way of

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 190

1 DR. LINDSEY CAMERON

2 creating -- creating a model, depicting a new  
3 mechanism, showing a process.

4 There are -- yes.

5 And I would say actually,  
6 thinking of hypothesis generation is what  
7 qualitative research of grounded theories is  
8 supposed to do, is actually a much older view  
9 in my field and you don't see it as commonly  
10 done, I would say, like, after 1995 or  
11 something like that.

12 It's not a frequent way that we  
13 construct theory. Some people still do it, but  
14 it's not a majority way. So that's, I feel a  
15 lot is taken out of context, looking at this  
16 random article in a journal that doesn't even  
17 look highly ranked, Australian Asian Marketing  
18 Research? Like, how do I even know this is a  
19 reputable source of data?

20 Q. Do you agree that a limitation  
21 of qualitative research is that it's  
22 susceptible to researcher bias?

23 MS. POLLOCK: Object to form.

24 THE WITNESS: I wouldn't use the  
25 word limitation. In fact, if you look at

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 191

1 DR. LINDSEY CAMERON  
2 the limitation section of most management  
3 papers, they don't -- nobody says this.

4 What -- any research is subject  
5 to bias. So what is important is how you  
6 have triangulation, how do you account  
7 for any biases you might have in a way to  
8 create a stronger research process.

9 So what you're describing,  
10 really, isn't something that we  
11 consider -- it's -- it's -- it's a way in  
12 the qualitative research process, a way  
13 to account for, because quantitative  
14 research has bias in it as well.

15 BY MR. WYATT:

16 Q. And how do you account for  
17 qualitative bias and qualitative research? I  
18 think I know how to do it in quantitative  
19 research, but I'm also familiar with  
20 qualitative research.

21 How do you control for bias in  
22 qualitative research?

23 A. I think that would be an  
24 interesting question to -- to ask you how you  
25 think you account for quantitative research



## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 192

1 DR. LINDSEY CAMERON  
2 because most quantitative research doesn't  
3 think there's bias in it.

4 But often, what you'll see is  
5 individuals will write some sort of an appendix  
6 where they're reflexus in their work. They've  
7 describe in their research methods section how  
8 there was a surprise, so how they thought of  
9 something as being X and then their mind  
10 changed to Y.

11 And you'll see that very  
12 commonly as a -- as something I describe in my  
13 methods section. And the fact that you can  
14 sort of have validity in your change -- and  
15 change the way you're thinking is a way to sort  
16 of -- to show -- not so much as to say that,  
17 like, you've controlled for the bias, that's a  
18 quantitative word, but that you've recognized  
19 it.

20 Also you collect data from  
21 multiple sources. So most of my studies have  
22 multiple sources of data, like a ride-hailing  
23 driver in multiple cities or interviewing  
24 people in multiple cities, or -- from multiple  
25 sources, so that's another way to sort of

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 193

1 DR. LINDSEY CAMERON

2 account for biases.

3 Q. Is it important for qualitative  
4 research of algorithmic management to collect  
5 data on the platform or organizational level?

6 MS. POLLOCK: Object to form.

7 THE WITNESS: I think the real  
8 question is, important for what?

9 It depends on what type of  
10 argument you're trying to make.

11 BY MR. WYATT:

12 Q. When would it be important?

13 A. If I wanted to say something at  
14 the firm level about -- and I'm kind of just  
15 postulating right now because I don't ask these  
16 types of research questions, but Möhlmann, et  
17 all, 2022, M-ö with the two dots over it,  
18 h-l-m-a-n-n, she has 2022 MISQ, where you've  
19 interviewed, I think, platform -- like, actual  
20 designers of the Uber technology.

21 And I think her research  
22 question there was appropriate for that, but I  
23 think she was looking at something more around  
24 algorithmic design and so she needed to look at  
25 designers of platforms for a research question.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 194

1 DR. LINDSEY CAMERON

2 Q. I'm just going to go back to --  
3 let's see -- Exhibit 10. This is the  
4 algorithmic management article, the one you  
5 thought might not be the final version.

6 Do you remember that one that we  
7 were talking about?

8 A. Yes. And that author, Möhlmann,  
9 is actually one of the authors on that paper.

10 Q. Oh, right here?

11 A. Yep.

12 Q. Got it. Okay.

13 And so if we go to Page 10,  
14 there's this table, "insights from the group  
15 discussion on algorithmic management", right?

16 A. Yes.

17 Q. And here it says, in order to  
18 fully grasp algorithmic management, it is  
19 crucial to collect data on the platform or  
20 organizational level, right?

21 A. Yes.

22 Q. And do you -- it sounds like you  
23 agree with that in some circumstances, but not  
24 others.

25 Is that correct?

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Page 195

1 DR. LINDSEY CAMERON

2 MS. POLLOCK: Object to form.

3 THE WITNESS: I would say that  
4 architectural management is a really  
5 large topic of study.

6 There's some areas of  
7 algorithmic management that you don't  
8 need -- organizational level, to answer  
9 your question.

10 And there's some types of  
11 research questions about how there's  
12 algorithmic management that you would  
13 want that.

14 And I think Möhlmann's 2022  
15 study is a good example of that. She  
16 looks at algorithmic management from a  
17 different angle and she gets data from  
18 those who work inside Uber the company.

19 BY MR. WYATT:

20 Q. And let me ask you about this  
21 last paragraph here, I'm going to read it and  
22 then I'm going to ask you if you agree.

23 "Participant research, e.g.  
24 researcher being an Uber driver themselves, is  
25 valuable and helps widen perspectives and see a

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 196

1 DR. LINDSEY CAMERON

2 situation of workers on the ground.

3 A difficult aspect of this,  
4 however, is that the situation and design of  
5 platforms in each market can change quickly,  
6 and by the time a paper is published, the lived  
7 experiences by the researcher might not reflect  
8 the situation anymore."

9 Do you see that?

10 A. Yes.

11 Q. And do you agree with that?

12 A. Yes.

13 Q. Has that affected any of your  
14 own research, looking back on it?

15 MS. POLLOCK: Object to form.

16 THE WITNESS: What do you mean,  
17 has it affected any of my research?

18 Can you say -- can you be a bit  
19 more specific about what you're asking?

20 BY MR. WYATT:

21 Q. Sure.

22 So after you published an  
23 article, have you ever gone back and looked at  
24 it and thought, this doesn't really apply  
25 anymore because the situation has changed?

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 197

1 DR. LINDSEY CAMERON

2 A. I think little pieces have  
3 changed. I -- I'm not sure if Trip Radar was  
4 around when I collected the majority of my  
5 data, but my -- I do -- my overall theory, my  
6 overall argument, does stand, even though  
7 there's a little technical change in the app.

8 But there are pieces that may  
9 be -- yeah -- one thing that changed, I think,  
10 is Uber used to -- I felt -- people felt like  
11 Uber used to match them based on geographic  
12 proximity, and now there's a lot of more pieces  
13 that I think go into the algorithm of that, I  
14 think I also talk about that in my 2024 ASQ,  
15 but those small empirical details changed.

16 Do I feel like my big argument  
17 about algorithmic control, does that theory  
18 still stand? Yes. And participant observation  
19 is only a small part of all the data I  
20 collected that goes into my research.

21 Q. And what else goes into the  
22 algorithm, beyond geographic proximity?

23 A. What I believe also goes in and  
24 that also comes from my research and also from  
25 reading data from this report, might be the

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 198

1 DR. LINDSEY CAMERON

2 rating of the driver, whether maybe the rating  
3 of the customer, whether or not they've chosen,  
4 like, get rides to destination.

5 There's probably something I'm  
6 not sure, like, if they're on a quest or if  
7 they're in some sort of incentive program.

8 Like, for example, it used to be  
9 with the loyalty programs, you would get  
10 priority matching if you were, like, at the  
11 highest level, if you were, like, if you were  
12 diamond or platinum.

13 I also think about whether or  
14 not someone has any safety violations in  
15 their -- you know, in their history that might  
16 affect who they might get matched with.

17 So there are a lot of different  
18 pieces, I think, that go into how the algorithm  
19 gets matches, it's not just geographic  
20 proximity.

21 Q. And that's based on reading the  
22 literature and reading the documents in this  
23 case.

24 Is that correct?

25 A. Yep. Exactly.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 199

1 DR. LINDSEY CAMERON

2 Q. Okay.

3 Let me put your report back up.

4 In Paragraph 8, you write, "as a  
5 structural ethnographer, my approach to  
6 research is worker-centered, seriously  
7 considering workers' experience in my analysis  
8 to develop broader claims about social  
9 structures and processes."

10 Do you see that?

11 A. Correct.

12 Q. And we've talked a little bit  
13 about that today. And I think we may have  
14 talked about this as well, but just to be sure,  
15 do you need a representative sample for  
16 qualitative work like this?

17 A. No. You wouldn't want a  
18 representative sample, you need to do  
19 theoretical sampling.

20 Q. That's right.

21 And you said theoretical  
22 sampling is not looking for -- because  
23 representative looks at the median, the middle,  
24 and not the whole picture.

25 Is that right?



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Page 200

1 DR. LINDSEY CAMERON

2 A. Exactly.

3 It's mean versus variance.

4 Q. Okay. And so, statistical  
5 significance, is that a concept that applies in  
6 this situation or is that a --

7 A. Not at all. Not at all.

8 Q. Okay. And why not?

9 A. Statistical significance is  
10 about you comparing two groups and whether or  
11 not they're above or below some threshold.

12 And I mean there's a whole  
13 conversation about how statistics had decided  
14 P less than .05 is the right number and how  
15 that's grounded in, like -- like phrenology,  
16 you know, the thing where they study people's  
17 heads and determine if there are differences by  
18 race.

19 What I'm trying to say is, P  
20 less than .05 is an arbitrary made-up number  
21 when we compare groups, how we think there's  
22 differences that has racial implications or  
23 racial history behind it.

24 That's not at all what we do in  
25 qualitative research.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 201

1 DR. LINDSEY CAMERON

2 Qualitative research is about  
3 going deep within, like, a phenomenon and  
4 finding variance, maybe, between processes or  
5 actions or events within that one process.

6 Q. And you have referred earlier  
7 today to this idea of triangulation, right?

8 A. Correct.

9 Q. And does triangulation also have  
10 some sort of minimum number of samples you need  
11 before you can really draw conclusions or not?

12 A. No. It really depends on what  
13 your sample is.

14 Like, if I was studying the  
15 Supreme Court and I had an NN9, that would be  
16 great, you know, it doesn't -- your N could be  
17 nine, your N could be 500, it depends on what  
18 you're trying to get at.

19 N means sample size.

20 Q. Yeah. I got you there.

21 So what ingredients in  
22 triangulation make you comfortable that the  
23 conclusions you reach about drivers on the Uber  
24 platform is generalizable?

25 MS. POLLOCK: Object to form.

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Page 202

1 DR. LINDSEY CAMERON

2 THE WITNESS: Can you say that  
3 one more time?

4 BY MR. WYATT:

5 Q. Well, let me take a step back.  
6 I'm linking triangulation and generalizability.  
7 Are those two things related?

8 A. Not quite, that's why I was  
9 confused.

10 Q. Okay. Help me understand the  
11 relationship between triangulation and  
12 generalizability, do you need triangulation to  
13 have generalizability?

14 A. It's one of the things that  
15 helps. Generalizability is almost -- it's like  
16 the outcome when you've done rigorous research,  
17 and so triangulation is one of the components  
18 that help make the research rigorous.

19 Q. Okay. Do you think for your  
20 work, it would have been sufficient to -- to  
21 make general conclusions, based on an interview  
22 of just one driver on the Uber platform?

23 MS. POLLOCK: Object to form.

24 THE WITNESS: Not for the type  
25 of research that I want to do -- not for

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 203

1 DR. LINDSEY CAMERON  
2 the type of research questions I'm  
3 interested in, but there are people who  
4 have just interviewed one person and,  
5 like, followed them around for three  
6 years.

7 Here, again, I think you know  
8 Whitman 2013, she looks at ethological  
9 sensemaking and she lives with an Inuit  
10 for three years and writes about  
11 environment and change and management.

12 So the end just differs, based  
13 on your research, but on my research  
14 question, no, just an N of one would have  
15 been insufficient.

16 BY MR. WYATT:

17 Q. And how did you decide when N  
18 was enough for the purposes of your research?

19 A. Theoretical saturation, which we  
20 talked about before.

21 Q. And remind me what theoretical  
22 saturation is?

23 A. Theoretical saturation is when  
24 you are -- there's an iterative process of  
25 which I cite this in Cameron 2022, why I

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 204

1 DR. LINDSEY CAMERON  
2 collected data in like a tranche for a few  
3 weeks.

4 And I would analyze the data and  
5 I would go and collect more data, and then I  
6 would analyze it again, so this went back and  
7 forth for 18 months.

8 And toward the end of the  
9 18 months, I was getting repetition across --  
10 when I brought and collect data, it would just  
11 confirm what I already had known and that's a  
12 sign that you've reached theocratical  
13 saturation and you can stop collecting data.

14 Q. Okay. All right.

15 Give me a second.

16 In Paragraph 10 you talked about  
17 your own time driving on the Uber platform.

18 Do you see that?

19 A. Yes.

20 Q. Were you interviewing people  
21 while work -- while working as a driver on the  
22 platform?

23 A. No.

24 Wait, do you mean interviewing  
25 people in my car or interviewing drivers in

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 205

1 DR. LINDSEY CAMERON

2 general?

3 Q. Interviewing people in your car?

4 A. No.

5 Q. So how did you -- what was the  
6 output from the driving -- your driving  
7 experience that informed your research?

8 A. It's more -- it's like -- it's  
9 like a log of my rides and what happened on  
10 each of the rides.

11 Q. Okay. So the -- the interviews,  
12 the semistructured interviews and the  
13 conversations, those were when you were not  
14 driving yourself.

15 Is that correct?

16 A. Exactly.

17 Q. Okay. And what was the process  
18 for one of these semistructured interviews, the  
19 drivers?

20 A. I would have a -- an interview  
21 protocol and we would go through the interview  
22 protocol.

23 Q. And what would the interview  
24 protocol consist of?

25 A. Cameron 2022 has -- toward the

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 206

1 DR. LINDSEY CAMERON

2 bottom, it describes what the three different  
3 buckets are.

4 They -- I can't remember off the  
5 top of my head, but they each -- there are  
6 three different themes that I ask questions  
7 around.

8 Q. Okay. And that was kind of  
9 prepared in advance of the project and then  
10 would be executed kind of in each driving  
11 situation.

12 Is that how it worked?

13 A. In each interview, correct, but  
14 one of the things about theoretical samplings  
15 that you're changing your interview as you're  
16 collecting the data, because you're reading the  
17 literature and getting sharper and sharper  
18 about what your research question is.

19 So you don't ask the same  
20 question in Interview 1 that you ask at  
21 Interview 150.

22 Q. And do you document your changed  
23 approach in some ways? Like, do you revise a  
24 script or an outline or something --

25 A. Yes. I do analyze my outline

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 207

1 DR. LINDSEY CAMERON  
2 after -- I think it was usually after every  
3 five or seven interviews, I would revise it  
4 some, but there are also semistructured  
5 interviews, you also kind of go with the flow  
6 of how -- what is important to the driver,  
7 what's top of mind to them.

8 Q. And do you still have those  
9 outlines and protocols?

10 A. So the best -- the best thing  
11 that gets at this would be at the bottom of  
12 Cameron 2022 where I, like, outline what I  
13 cover in each chunk of the interview.

14 Q. Okay.

15 A. Because that stayed the same.

16 Q. Okay. And we talked before  
17 about Mr. Okapaku's, you know, reliance on  
18 anecdotal information and you've talked about  
19 conversational interviews you've conducted in  
20 addition to the semistructured interviews.

21 How are conversational  
22 interviews different from the kinds of  
23 anecdotal information Mr. Okapaku describes?

24 A. The difference -- the  
25 conversational interviews are actually more



## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 208

1 DR. LINDSEY CAMERON  
2 common in pure ethnography. Like Vetchky  
3 (phonetic), 2003, relies on them quite a bit.

4 Conversational interviews have a  
5 purpose behind them. There's -- they're not  
6 the same as an interview protocol, but there is  
7 specific information or things that I'm asking  
8 them about in the conversational interview.

9 But the majority of data that my  
10 research is actually informed by are these  
11 semistructured interviews, not the  
12 conversational ones.

13 And there's also something about  
14 the sheer amount of the number of  
15 conversational interviews that make them  
16 different from anecdotal and the fact that they  
17 are housed within this larger research body,  
18 which include driving, semistructured  
19 interviews, archival, field surveys, financial  
20 data, all these things make it not anecdotal.

21 Q. And I think you mentioned  
22 earlier you've done interviews both in  
23 North America and outside.

24 Is that correct?

25 A. Correct.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 209

1 DR. LINDSEY CAMERON

2 Q. Do you know if you've  
3 interviewed any drivers in Arizona?

4 A. No. I don't know.

5 Q. Do you know if you've  
6 interviewed any drivers in North Carolina?

7 A. No. I don't know.

8 I think the answer is no to  
9 both, but I don't know.

10 Q. And what about California?

11 A. Yes. I've interviewed drivers  
12 in California.

13 Q. You've worked with a research  
14 assistant for some of this research that you  
15 have done in the past.

16 Is that correct?

17 A. Correct.

18 Q. And the research assistant who  
19 also was trained by you and collected research  
20 data in a similar fashion.

21 Is that right?

22 A. They -- they drove, so they had  
23 driving logs they shared with me.

24 Q. Okay.

25 So not -- not interviews, just

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Page 210

1 DR. LINDSEY CAMERON

2 driving?

3 A. In the North America data, I  
4 conducted all the interviews.

5 Q. Okay. In Paragraph 10 here you  
6 mention, "Outside of North America, my  
7 ride-hailing datasets include interviews with  
8 drivers, field notes from observations, forum  
9 data and participants' artifacts."

10 Do you see that?

11 A. Correct.

12 Q. And what is artifacts as you're  
13 using in that context?

14 A. Like, pictures. Like screen  
15 shots of them as they're driving, photos of  
16 their cars, like, a lot of the rides are paid  
17 in cash, so they have different places they hid  
18 the cash in around the car. Some of them do  
19 strikes so they show pictures to me of like how  
20 do we strike. So artifacts basically mean,  
21 like, visual images.

22 Q. And we talked a little bit about  
23 the kind of the timeline of your research in  
24 this field and how in some ways it hasn't  
25 ended.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 211

1 DR. LINDSEY CAMERON

2 But when was the last  
3 semistructured interviews of someone that  
4 you've done?

5 A. This summer, August.

6 Q. Okay.

7 And that was outside the U.S.  
8 Is that right?

9 A. Yes. I'm trying to make sure  
10 that's accurate. Yeah. I think it's August,  
11 because I was teaching in September.

12 Q. And is that the focus of your  
13 current research, just out of the U.S. or not  
14 necessarily?

15 A. I'm -- I'm thinking for a  
16 minute. I've been writing a few conceptual  
17 review pieces now, and in my empirical data  
18 is -- yeah -- outside of North America right  
19 now. And I have a paper on DoorDash that's  
20 about to come out.

21 Q. Okay. So you -- you continue to  
22 do research elsewhere in the gig economy, not  
23 just with respect to ride-hailing?

24 A. Right.

25 If you look at that very last

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Page 212

1 DR. LINDSEY CAMERON

2 sentence, it mentions some of the other  
3 companies I've studied, InstaCart, Task Rabbit,  
4 Upwork.

5 Q. Okay. If we scoot forward to  
6 the methodology section, there's three  
7 paragraphs in the methodology section and I  
8 think -- go through these and we can take  
9 another break, if that makes sense?

10 So it's 26, 27 and 28, right?

11 A. Yes.

12 Q. Okay. So in 26, you kind of  
13 describe your academic background and current  
14 focus, right?

15 A. Correct.

16 Q. Okay. 27 explains your research  
17 program. And I'm trying to condense this,  
18 because we've talked about some of this stuff  
19 before, but is that basically correct?

20 A. Yes. That's what Paragraph 27  
21 talks about.

22 Q. Okay. And -- and you talk about  
23 the -- the things we've been talking about,  
24 semistructured interviews, conversational  
25 interviews, right?

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 213

1 DR. LINDSEY CAMERON

2 A. Correct.

3 Q. And are those methods that  
4 you've used for this case?

5 A. Are you asking if I conducted  
6 interviews for this case?

7 Q. Not exactly, because I think the  
8 answer to that is no, because I think you  
9 answered that previously.

10 Is that right?

11 A. Correct. I didn't do any  
12 interviews.

13 Q. But we are in the methodology  
14 section of your report here and so I'm just  
15 trying to understand how these methods  
16 described here relate to your opinions in this  
17 case.

18 A. So I see this Paragraph 27 is  
19 more as a setup for the follow-on paragraph,  
20 which is to say, I -- I collect a lot of  
21 textual data and I analyze that data, draw  
22 conclusions and write papers.

23 And I use that similar grounded  
24 theory approach that I've done to analyze all  
25 this data in the U.S. and in the UK and like

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Page 214

1 DR. LINDSEY CAMERON

2 Brazil and all these places, I used a similar  
3 sort of research methodology in going through  
4 the data that I received from this case.

5 Q. Okay. So you're not doing  
6 literally the same thing of interviewing  
7 people, but you're using a grounded theory  
8 approach to reviewing, I guess, the literature  
9 and documents that you cite in this case?

10 Is that the right way to think  
11 about it?

12 A. Exactly.

13 Q. Okay. And you mentioned here in  
14 28, you say, this iterative process includes  
15 reading materials carefully, iterative open and  
16 focused coding, creating analytical categories,  
17 writing memos, engaging in academic  
18 conversations and drafting reports, correct?

19 A. Correct.

20 Q. Okay. So did -- what, if any,  
21 iterative open and focused coding did you do  
22 here?

23 A. So I mentioned -- so I get all  
24 the paper in hard copy.

25 So I have huge boxes of paper in

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 215

1 DR. LINDSEY CAMERON

2 my office and so I sort of skim through to  
3 think about what's most important. I think  
4 the -- the data that comes directly from Uber  
5 is most important.

6 So then I start reading it and  
7 thinking, okay, this is about, I don't know,  
8 our rating system, this is about matching, and  
9 I start creating all these little piles on my  
10 floor. This is the first round of coding of  
11 the data.

12 And then once I have a pile on,  
13 say, algorithmic matching, I'll go through and  
14 I'll start putting it in smaller and smaller  
15 piles and writing on pieces of paper, okay,  
16 this fits to this, it fits to that, and that's  
17 called focus coding, as I'm getting more  
18 precise in my analysis and, like, moving things  
19 between piles and seeing connections.

20 Q. Okay. Coding, in my head,  
21 triggers spreadsheets. So I want to ask, but I  
22 get what you're saying.

23 A. Oh, okay.

24 Q. So creating analytical  
25 categories, that sounds somewhat similar to



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 216

1 DR. LINDSEY CAMERON

2 what you described, but is it something  
3 different?

4 A. Yes.

5 Basically the -- the coding is  
6 the fine grain of the data and then the -- the  
7 category is, like, a level up or a level to, in  
8 terms of abstraction. So if they're -- they're  
9 happening at the same time.

10 Q. Okay. And writing memos, did  
11 you write memos as part of this exercise?

12 A. I did but you can also think of  
13 them as sections of the report, like,  
14 everything went into the report.

15 Q. Okay. And you refer to engaged  
16 in academic conversations.

17 Can you tell me more about that?

18 A. Yeah. There are a few theories  
19 in here that were new that I was thinking  
20 about.

21 One was on -- certification,  
22 platform decay, another one was cultural  
23 narratives, and so -- you know, if I have a  
24 coauthor and I'm like, hey, you know a lot  
25 about -- (inaudible) -- tell me about it?

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Page 217

1 DR. LINDSEY CAMERON

2 And so, you know, I would talk  
3 to them about the literature. They would talk  
4 to me about their ideas.

5 So I never would discuss  
6 anything about the case, but there's a way of  
7 which there's, like, a -- like, new ideas would  
8 get clarified by talking about it to them.

9 Q. Okay.

10 MR. WYATT: Okay. I think those  
11 are my questions for methodology.

12 Is now a good time to take a  
13 break?

14 MS. POLLOCK: I think so.

15 THE WITNESS: Yeah.

16 Sounds good.

17 MR. WYATT: Okay. You want to  
18 just do ten minutes again?

19 THE WITNESS: Great.

20 THE VIDEOGRAPHER: Going off the  
21 video record. The time is 6:05 p.m.

22 - - -

23 (Whereupon, a recess took place  
24 from 6:05 p.m. to 6:20 p.m.).

25 - - -

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Page 218

1 DR. LINDSEY CAMERON

2 THE VIDEOGRAPHER: We are back  
3 on the video record. The time is  
4 6:20 p.m. This begins  
5 Media Unit Number 4.

6 BY MR. WYATT:

7 Q. Welcome back, Dr. Cameron.

8 A. Thank you.

9 Q. So let me put your report back  
10 up. And we just finished the methodology  
11 section and now we're in Section V, which is,  
12 "Overview of on-Demand Labor Organizations and  
13 Their Life Cycle."

14 Do you see that?

15 A. Yes.

16 Q. And in Paragraph 29, you say "At  
17 the most basic level, on-demand labor companies  
18 are an intermediary that connect workers and  
19 other parties, e.g., customers, clients,  
20 merchants, to facilitate an economic exchange."

21 Do you see that first sentence?

22 A. Correct.

23 Q. And does that apply to Uber, in  
24 your view?

25 A. Uber is an on-demand labor

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Page 219

1 DR. LINDSEY CAMERON  
2 company. I would not feel comfortable just  
3 saying Uber is an intermediary, full stop. To  
4 me, that's too simple. Though, I do know  
5 there's some scholars in economics and  
6 strategies that see differently than me.

7 But I would agree that Uber  
8 connects workers and other parties to  
9 facilitate an economic exchange.

10 Q. Okay. And what -- what more  
11 than an intermediary do you view Uber as?

12 MS. POLLOCK: Object to form.

13 BY MR. WYATT:

14 Q. Or what else?

15 A. So my research doesn't  
16 particular tend to look at Uber as a noun. It  
17 looks at the processes that are underlining  
18 Uber, so all the control that we've been  
19 talking about.

20 And I'm just being thoughtful  
21 here, because I know there are schools of  
22 thought that don't -- when you just say  
23 intermediary, they don't actually look at what  
24 the intermediary does or how it has control or  
25 ways that Uber claims -- or Uber, I don't think

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Page 220

1 DR. LINDSEY CAMERON

2 any gig economy company says they create  
3 marketplaces when actually I don't see them  
4 creating a marketplace.

5 It's just -- it's a contested  
6 term that's used differently across  
7 disciplines, so I'm just trying to give you  
8 more context on how I see it.

9 Q. And just to flush out from my  
10 own understanding, so you're suggesting that  
11 intermediary can sort of downplay something  
12 about the company in question and its role?

13 A. I think it's -- to understand  
14 them just as a digital intermediary, limits it.  
15 I wouldn't say downplay, but limits.

16 Q. Limits. Okay.

17 And do you view Uber as a  
18 transportation company?

19 MS. POLLOCK: Object to form.

20 THE WITNESS: I view it as an  
21 on-demand company, to be honest.

22 BY MR. WYATT:

23 Q. Okay. Uber operates a digital  
24 smart phone application, the Uber app, correct?

25 A. Yeah.

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Page 221

1 DR. LINDSEY CAMERON

2 MS. POLLOCK: Object to form.

3 THE WITNESS: I would agree that  
4 Uber operates an app. Yeah. It operates  
5 the app. It designs the app. It -- the  
6 app is an interface for control.

7 It's more than just -- it's more  
8 than just operating. It doesn't just  
9 like buy it off the shelf and then  
10 operate it, like a -- a robo call or a  
11 little remote car, the relationship.

12 BY MR. WYATT:

13 Q. And would you agree that the app  
14 facilitates the provision of services by  
15 drivers to riders?

16 MS. POLLOCK: Object to form.

17 THE WITNESS: I don't love the  
18 word facilitate to service, because  
19 that's something that's used more in the  
20 e-con strategy literature, so I wouldn't  
21 use those terms. I would say it matches  
22 workers with customers.

23 BY MR. WYATT:

24 Q. Okay.

25 Are you familiar with the

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Page 222

1 DR. LINDSEY CAMERON

2 platform Access Agreement that drivers need to  
3 sign to get access to the Uber platform as a  
4 driver?

5 A. I believe I've reviewed this as  
6 one of the documents for this report.

7 Q. When you onboarded as a driver,  
8 if you recall, is that something that you  
9 reviewed?

10 A. I can't remember, but I'm sure I  
11 did.

12 Q. And you agree that drivers who  
13 utilize the Uber app are not restricted from  
14 driving on other similar platforms, correct?

15 A. I agree.

16 Drivers can multi-home if there  
17 are multiple riding-hailing platforms in their  
18 city.

19 Q. And they can also work other  
20 jobs if it works with their schedule, correct?

21 A. I'd agree. Yes.

22 Q. And was it your experience that  
23 drivers are responsible for their own expenses  
24 when they drive on the app?

25 MS. POLLOCK: Object to form.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 223

1 DR. LINDSEY CAMERON

2 THE WITNESS: Yes.

3 It is my experience drivers are  
4 responsible for, like, their mileage and  
5 their gas and insurance, things like  
6 that.

7 BY MR. WYATT:

8 Q. And do you know, or maybe you  
9 experienced this yourself, are drivers  
10 responsible for paying taxes on their income  
11 from driving on the app?

12 A. Yes. I do see drivers as being  
13 responsible for paying for their taxes.

14 Q. Okay. Have you ever seen Uber's  
15 algorithm management system?

16 MS. POLLOCK: Object to form.

17 BY MR. WYATT:

18 Q. Like the code?

19 A. That's an interesting question.  
20 I have seen decision trees that  
21 led -- like, that tell you how -- Uber how to  
22 respond or an Uber rep to respond when there  
23 are -- there's some sort of problem.

24 And I do see that as code.

25 I mean, a decision tree is a



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Page 224

1 DR. LINDSEY CAMERON

2 type of logic code.

3 Q. Okay. Fair enough.

4 Have you seen the computer code  
5 behind it, though?

6 A. No.

7 I have not seen computer code.

8 Q. Do you know if the algorithm  
9 determines the pay rates for drivers?

10 A. For rating the -- the documents  
11 that were provided from me and everything  
12 that's been published, and my own research, I  
13 do believe the algorithmic management system  
14 sets the pay rate for drivers.

15 Q. And -- and similarly, does it  
16 set what the customers are charged, the riders?

17 A. Yes. From what I can tell it  
18 also sets what customers are charged.

19 Q. And does the algorithm evaluate  
20 required behaviors in any way?

21 MS. POLLOCK: Object to form.

22 Incomplete hypothetical.

23 THE WITNESS: Yes. It does.

24 BY MR. WYATT:

25 Q. And how does it do that?

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Page 225

1 DR. LINDSEY CAMERON

2 Like, in what ways?

3 A. It monitors telemetrics, so like  
4 acceleration, deceleration, speed and braking.  
5 It monitors how fast people are accepting rides  
6 or on-time arrival, things like that, and then,  
7 of course, there's the customer rating systems.

8 The customers are inputting in  
9 ratings and those ratings are then averaged or  
10 calculated by the algorithmic management system  
11 and they influence the opportunities that are  
12 presented to drivers, whether or not it's their  
13 pay or what rides they get matched to or if  
14 there are in the loyalty program.

15 Q. And I think the answer to this  
16 for this case is no, but I don't know about  
17 your research.

18 Have you ever spoken with an  
19 Uber representative about how the algorithm  
20 works?

21 A. You can check my 2024 ASQ. I  
22 briefly mention it, how Uber employee sort of  
23 ended up in some of my job talks and had  
24 comments for me about the algorithmic  
25 management system, but that wasn't a formal

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Page 226

1 DR. LINDSEY CAMERON  
2 interview. That was somebody coming up to talk  
3 to me at a talk.

4 Q. Did you invite them to the talk  
5 or they were just there?

6 A. No. They just showed up.

7 And similarly, you know I have  
8 students that are former Uber employees who end  
9 up bringing up Uber in class or talk to me  
10 about it, but I mean, those -- that's not part  
11 of my research at all.

12 Q. Okay. And it wasn't something  
13 you specifically attempted to obtain for  
14 forming your opinions in this case.

15 Is that right?

16 A. No. Not at all.

17 I mean, there's a fair amount of  
18 research here. I'm thinking of Christian 2020  
19 that talks about how one can study algorithmic  
20 management systems without actually getting  
21 internal data from the platform company and  
22 that's actually a very rigorous scientific way  
23 to get data.

24 There's also a fair amount of  
25 concern, some which I talk about in the report,

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 227

1 DR. LINDSEY CAMERON  
2 about researchers who have partnered with Uber  
3 and have their data have been called into  
4 question or not having rigorous scientific  
5 integrity.

6 So from a theoretical  
7 perspective, I didn't need to work with any  
8 Uber employees or -- you know, -- to answer my  
9 research questions, but there are also these  
10 other ethical questions that were also in play.

11 Q. Okay. And I think you mentioned  
12 earlier you only skimmed the depositions, but  
13 to the extent the depositions you received may  
14 have discussed the algorithms, that's not  
15 something you're relying on here either.

16 Is that right?

17 A. Not in this case, but I've read  
18 many depositions of Uber employees for other  
19 cases, so they have informed my general  
20 knowledge.

21 Q. Do you by any chance remember  
22 any names of folks that you've read in prior  
23 cases?

24 A. Let me think.

25 Q. Just -- just your employees. I

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Page 228

1 DR. LINDSEY CAMERON

2 don't want to know about other cases, but any  
3 Uber representatives that you recall testimony  
4 of?

5 A. No. But if you're able to pull  
6 the public versions of my report, it will  
7 probably have -- it will have it referenced in  
8 there, I think.

9 Q. Okay. Okay. All right.

10 So let's go to 32. And you  
11 refer here to the early stages of a platform --  
12 platform organizations lifecycle, right?

13 A. Yes.

14 Q. And you say, "They may shift  
15 their activities towards workers and customers  
16 to capture more value", right?

17 A. Yes.

18 Q. And this process, in which there  
19 is a slow degrade of the functionality of the  
20 platform is called platform decay or the or --  
21 previously, enshitification, is that right?

22 A. Yeah.

23 That's Cory Doctorow's word.

24 Q. That's kind of an unpleasant  
25 word, right?

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Page 229

1 DR. LINDSEY CAMERON

2 A. It is. He -- he's -- he's --  
3 he's -- he's done a lot of writing about  
4 bringing forth that word.

5 I think a really great example  
6 he has is for social media platforms, how, you  
7 know, the feeds become very cluttered and the  
8 platform quality degrades.

9 Q. And is that -- is his research  
10 qualitative as well?

11 A. I'm not sure.

12 I -- I -- it might be more  
13 qualitative, but I'm not sure. I think it is.

14 Q. And is this -- I mean, this is  
15 described as a general concept in your report,  
16 but is this something that you believe applies  
17 to the Uber platform?

18 MS. POLLOCK: Object to form.

19 THE WITNESS: I'm still making  
20 up my mind about this, to be -- to be  
21 completely transparent here.

22 There has been a way, though,  
23 because I've interviewed drivers over so  
24 many years, there does seem to be a  
25 decline in what drivers are getting paid.

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Page 230

1 DR. LINDSEY CAMERON

2 And there does -- people are  
3 talking a lot about -- about not being  
4 able to get the matches they want, not  
5 being able to be in the areas, like, the  
6 surge pricing being more unpredictable.

7 So there is -- particularly when  
8 you've interviewed drivers -- the same  
9 driver over many years, especially  
10 drivers who have been driving since 2013,  
11 it does seem today's platform is not the  
12 same platform of 2015.

13 Now, back -- and giving drivers  
14 their own iPhone to drive, you know, and  
15 ice cream parties to celebrate that.

16 So there does seem to be some  
17 sort of degrade in service, but I haven't  
18 studied this rigorously, so -- but I -- I  
19 think there's some value in thinking  
20 about this theory of platform decay.

21 BY MR. WYATT:

22 Q. So this isn't something you  
23 published on, is that fair, as it relates to  
24 Uber specifically?

25 A. No. I haven't, but Mike Maffie

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 231

1 DR. LINDSEY CAMERON

2 has, but I haven't published on platform decay.

3 Q. Okay. And so --

4 A. That is actually not -- I have  
5 a -- a -- a forthcoming article, the one I just  
6 said was accepted, where I talk about platform  
7 decay, but I do -- I have not empirically  
8 studied platform decay.

9 Q. Okay. Okay.

10 So Paragraph 35, you write,  
11 "Research shows there are two crucial points  
12 where drivers may leave ride-hailing,  
13 onboarding after the first ride or after  
14 significant rides. Ride-hailing companies have  
15 high turn rates with 50 to 96% annual  
16 turnover."

17 Do you see that?

18 A. Yes.

19 Q. How does that relate to  
20 organizational control over drivers, or does  
21 it?

22 A. Can I see the paragraph right  
23 before where we were talking about platform  
24 decay?

25 Q. That's a good question.



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Page 232

1 DR. LINDSEY CAMERON

2 Let's see.

3 A. Yeah.

4 Q. Oops.

5 So is this more about platform  
6 decay than organizational control?

7 A. You know, I think when I was  
8 writing this paragraph, I was actually thinking  
9 about the loyalty programs and how loyalty  
10 programs are designed to entice drivers to keep  
11 driving around these different inflection  
12 points.

13 So I think actually where  
14 it's -- that paragraph is, is probably not the  
15 best place for it to be in that paragraph.

16 Q. Okay. So you would --

17 A. Or best place -- a best place to  
18 be in the report, that's what I meant to say.

19 Q. Right. You would move it down  
20 to somewhere later in the report?

21 A. Yeah. I think so.

22 Q. To where you talk about, like,  
23 Uber Pro and those types of things?

24 A. Yeah.

25 Q. Okay. And then, if we look

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Page 233

1 DR. LINDSEY CAMERON

2 ahead to the next section, that's where we get  
3 back into organizational control.

4 And I think we looked at that  
5 paragraph earlier because it's where the  
6 definition is, right?

7 A. Correct.

8 Q. And does organizational control  
9 apply to employees, as well as independent  
10 contractors?

11 A. So my answer is, people who are  
12 classified as employees or independent  
13 contractors, if I just sort of add a more  
14 nuance version of what you just said, and given  
15 I just wrote a report about drivers who are  
16 classified as -- as independent contractors,  
17 and I'm talking about organizational control, I  
18 would say yes.

19 Q. Okay. And is organizational  
20 control related to labor process theory?

21 MS. POLLOCK: Object to form.

22 THE WITNESS: Wow. I'm  
23 thinking, because that's a -- you --  
24 you've put together two big concepts.

25 BY MR. WYATT:

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 234

1 DR. LINDSEY CAMERON

2 Q. Let me be less oblique about  
3 it --

4 A. Yes.

5 Q. -- and you can answer a question  
6 in context --

7 A. Right.

8 Q. -- rather than -- rather than  
9 giving you an examine and ask for scores or  
10 something. Hold on a second.

11 So going back to this article,  
12 which is the algorithmic management article,  
13 which is -- let's see -- Exhibit 10.

14 Here it says, "Labor process  
15 theory and adjacent Marxist approaches are  
16 frequently used as the theoretical basis,  
17 stressing aspect of control and power."

18 And so I'm trying to understand  
19 if there's a link between labor process theory  
20 and this concept of organizational control.

21 A. True. Just because you didn't  
22 use the word organizational, you kind of -- you  
23 queued me thinking about different literature  
24 than this.

25 This is -- this is sometimes --

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Page 235

1 DR. LINDSEY CAMERON

2 organizational control and labor process theory  
3 are two different theoretical veins, but labor  
4 process theory very much talks about control.

5 Q. Okay. Control of labor.

6 Is that right?

7 A. Yeah. I'd say -- let me sit  
8 here and just think, because it's a really big  
9 theory. It's controlled labor. It's control  
10 of the work process. It's the control of  
11 managers. It's control of a lot of different  
12 things in the work process. Yeah. It includes  
13 labor and it includes workers.

14 Q. Is algorithmic control a kind of  
15 organizational control?

16 MS. POLLOCK: Object to form.

17 THE WITNESS: That is a very big  
18 question, but drawing on (phonetic),  
19 2009, I would say yes.

20 Or more accurately, algorithmic  
21 management is a form of organizational  
22 control.

23 BY MR. WYATT:

24 Q. Okay.

25 And do you consider yourself one

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Page 236

1 DR. LINDSEY CAMERON

2 of the earlier leading scholars on algorithmic  
3 control?

4 A. On algorithmic management? One  
5 of the leading scholars. Yes.

6 Q. Okay. I'll try to get it right,  
7 it's obviously written in my outline a  
8 different way, but I'll try to make the  
9 adjustment going forward.

10 Algorithmic management.

11 A. Yes.

12 Q. And does Uber, with respect to  
13 drivers, exert types of control, other than  
14 algorithmic management?

15 A. I would say yes.

16 Q. And what are those other types  
17 of control?

18 A. Off the top of my head, I talked  
19 about the cultural narratives in this report,  
20 so I do see the cultural narratives as a form  
21 of social-cultural control.

22 Let me think.

23 We have normative control, I  
24 just wrote a paper on that, so that's another  
25 form of control that's not algorithmic, but

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Page 237

1 DR. LINDSEY CAMERON

2 there are parts of algorithmic management  
3 that's embedded within neo-normative control.

4 Those are the two big examples I  
5 can think of right now.

6 Q. And generally speaking, are  
7 there types of control that apply to workers  
8 classified as employees that don't apply to  
9 workers applied as independent contractors or  
10 vice versa?

11 A. My answer to this is, yes, this  
12 is not my area of expertise, so I would read  
13 Cappelli and Teller, 2013 or 2023, they both  
14 talk about this.

15 Q. Okay. And do you know if Uber  
16 provides drivers with any business  
17 registrations or licenses?

18 A. To the best of my knowledge,  
19 they don't.

20 Q. And Uber doesn't pay drivers a  
21 salary or hourly rate, correct?

22 A. I believe in certain cities they  
23 do have a minimum hourly rate, such as  
24 New York City and Seattle.

25 Q. Okay. But outside situations

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Page 238

1 DR. LINDSEY CAMERON

2 like that, in general, there wouldn't be an  
3 hourly rate, correct?

4 MS. POLLOCK: Object to form.

5 THE WITNESS: I'm not entirely  
6 sure all of the cities that have a  
7 minimum hourly rate, but for the cities  
8 where there's not a minimum hourly rate,  
9 then I would say, no, Uber does not pay  
10 its driver a minimum hourly rate.

11 BY MR. WYATT:

12 Q. And --

13 A. Because I think Minneapolis  
14 might also do a minimum hourly rate, if I'm  
15 remembering.

16 Q. And does Uber provide drivers  
17 with the tools they need to complete their  
18 work, like the car, for example?

19 A. Uber does not provide a car, but  
20 they -- they provide this app interface.

21 Q. And you didn't consider any  
22 legal definitions of control, in forming your  
23 opinions in this case, right?

24 A. Not at all.

25 Q. Let's go to paragraph -- let's

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Page 239

1 DR. LINDSEY CAMERON

2 see -- let's get your report back up. So we go  
3 to Paragraph 37, you say, "there's conceptually  
4 two dimensions of organizational control,  
5 general and detailed", right?

6 A. Correct.

7 Q. And are both of those at issue  
8 here, general and detailed?

9 A. I believe so, but we'd need to  
10 go in the report specifically for -- to see how  
11 these two play out.

12 Q. Okay. And there's one example  
13 that you give here in Paragraph 37 about  
14 over -- some detail control, overprescribing  
15 elements of detailed control, for example, how  
16 long workers on the assemble line can go to the  
17 bathroom.

18 That specific example is not one  
19 that really applies here, correct?

20 A. No. Just so you know, the way  
21 this part of the report is laid out, there's a  
22 section that's theoretical, then there's a  
23 section that applies to Uber.

24 So this entire section is more  
25 the theoretical grounds.



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Page 240

1 DR. LINDSEY CAMERON

2 Q. Okay. I appreciate that.

3 And my pauses are me skipping  
4 questions, so these are good, I'm working  
5 through my outline here.

6 A. Pause away.

7 Q. Okay. So there's a method to  
8 the awkward silence madness. Okay.

9 So in Paragraph 41, you  
10 mention -- and this is the theoretical section  
11 here, but just so I can understand how it  
12 applies, you say, "that there's -- that  
13 Highland describes four levels of construction,  
14 meaning, construction of algorithms.

15 First, an algorithm is designed  
16 and planned such that it meets the needs of the  
17 organization. Second, the algorithm is  
18 programed by programmers who place a particular  
19 philosophical frame on the world that renders  
20 it amenable to the work of code and algorithms.

21 Third, algorithm -- algorithms  
22 are curated by data janitors. And finally,  
23 those who interact with the algorithms also  
24 participate in the construction, such that  
25 algorithmic decision only becomes effective

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 241

1 DR. LINDSEY CAMERON

2 through usage."

3 Do you see that?

4 A. Correct.

5 Q. Do these all apply to Uber or is  
6 this not necessary, because this is general?

7 A. Oh, well, I mean, it definitely  
8 applies to Uber because Uber has an algorithmic  
9 management system that runs underneath it.

10 So it's a general statement that  
11 I also believe applies to -- to any gig economy  
12 company.

13 Q. Great. So all four of these  
14 things apply whenever there's an algorithm  
15 involved, is that --

16 A. I would think so.

17 Q. -- okay.

18 A. And, you know, the main idea  
19 here is that code or algorithms are not --  
20 they're written by humans and there's biases  
21 and social norms that are encoded in that, and  
22 so that's the argument I'm making in that  
23 paragraph.

24 Q. Right.

25 So to take -- to take one of

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Page 242

1 DR. LINDSEY CAMERON

2 these and try to make it specific, in the next  
3 paragraph, actually, you say, "Algorithmic  
4 management systems reflect and embody broader  
5 social-cultural values and can never be seen as  
6 socially or politically neutral as just a  
7 tool."

8 Do you see that?

9 A. Correct.

10 Q. What broader social-cultural  
11 values are embodied in the algorithm --  
12 algorithms utilized in the Uber app?

13 A. So here I would direct you to  
14 the work of Veena Dubal, and I hope I'm not --  
15 I'm going to do my best to sort of paraphrase  
16 her work as I read it.

17 She argues there's algorithmic  
18 race discrimination that's done by the Uber  
19 app, that the prices are set a certain way  
20 that -- that workers are not paid a minimum  
21 wage, and that it often goes to workers who are  
22 black or brown or immigrants who are penalized  
23 the most.

24 And so she, I think, in her  
25 argumentation says, that's part of the larger

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Page 243

1 DR. LINDSEY CAMERON

2 system here in the United States where we  
3 devalue black and brown and immigrant bodies.

4 So that would be an example of  
5 that. I think I talked to you about the edit  
6 volume that -- that will be coming out shortly  
7 where I talk about how these ghost variables  
8 are embedded in algorithmic management systems.

9 There's -- there's other pieces  
10 in that edited volume that talk about the same  
11 phenomenon happening in Uber.

12 So that would be an example.

13 Q. Okay. And are these things that  
14 you've looked at in your research or you're  
15 drawing mostly from Dubal and others from this?

16 A. I'm drawing on other people's  
17 research. It's something I theoretically  
18 engage with, but it's not where the empirical  
19 part of my research is.

20 Q. Okay. And then -- let's see.  
21 Let's go to Paragraph 43, and we're talking  
22 about the four components of the algorithmic  
23 management that lead to an intensification of  
24 organizational control, right?

25 A. Yes.

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Page 244

1 DR. LINDSEY CAMERON

2 Q. And if we read further down in  
3 this Paragraph 43, it says, "Some scholars have  
4 are gone so far to call the control exercise by  
5 on-demand organizations as an invisible cage,  
6 because they implement a form of organizational  
7 control in which the criteria for success are  
8 largely invisible to workers and changes to  
9 those criteria are unpredictable made solely by  
10 the organization itself", correct?

11 A. Correct.

12 Q. Are you one of those scholars  
13 that goes so far as to call control as an  
14 invisible cage?

15 MS. POLLOCK: Objection to form.

16 THE WITNESS: That is an  
17 interesting question. I do not know the  
18 answer to, because Rothman and I have  
19 written several articles together.

20 So is it possible there has been  
21 an article in which I view this invisible  
22 cage that we are coauthors on, because  
23 it's joint work.

24 BY MR. WYATT:

25 Q. Well, I think this may be one of

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 245

1 DR. LINDSEY CAMERON

2 those articles, but I am asking you for your  
3 opinion, do you think that's a fair  
4 description, an invisible cage?

5 A. Of Uber specifically?

6 Q. Yeah.

7 A. I'm not entirely sure, to be  
8 honest.

9 Q. Okay. Okay.

10 And then in Paragraph 44, you  
11 write, "Several features contribute to the  
12 intensification of control by algorithmic  
13 management systems", right?

14 A. Yes.

15 Q. And you list a couple.

16 You say, embedded in cameras,  
17 biometrics trackers and sensors, algorithms  
18 record workers physical movements to prove  
19 adherence to the rules and the regulations of  
20 the organization, such as, by verifying worker  
21 identities."

22 And we talked a little bit about  
23 that before, right? Identity verification?

24 A. Correct.

25 Q. And then, tracking drivers'

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 246

1 DR. LINDSEY CAMERON

2 location, right?

3 A. Correct.

4 Q. Acceleration rate and braking  
5 speeds for workers operating motor vehicles,  
6 right?

7 A. Correct.

8 Q. And monitoring emails to assess  
9 mood and productivity?

10 A. Correct.

11 Q. And, you know, going back to the  
12 question of whether these things are good or  
13 bad, like, do you have an opinion as to whether  
14 it's a good or a bad thing to track drivers'  
15 location?

16 MS. POLLOCK: Object to form.

17 THE WITNESS: No. I don't  
18 really have an opinion there.

19 BY MR. WYATT:

20 Q. And so, you -- you -- is the  
21 purpose of mentioning it here is that this is  
22 -- good or bad, it's some form of control that  
23 an on-demand platform can exercise that --

24 A. Exactly. Exactly.

25 That's what's important.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 247

1 DR. LINDSEY CAMERON

2 Q. -- okay.

3 And so you're not weighing and  
4 you're not making value judgments as to whether  
5 or not these are good or bad things?

6 A. No. I'm trying not to.

7 The title of one of my papers is  
8 the Good Bad Job where I'm really trying to  
9 hold multiple viewpoints and just talk about  
10 control.

11 Q. Okay. And this is a general  
12 opinion, we're still in general here, right?

13 44?

14 A. Yes. We're still in general.

15 Q. So, for example, monitoring  
16 emails, I mean, I didn't see this come up  
17 later.

18 You're not opining that Uber  
19 monitors emails or messages or anything of  
20 their drivers, right?

21 A. No. I'm not.

22 Q. Okay. And, you know, one -- one  
23 aspect here, tracking location, is that  
24 something that goes into the algorithm for  
25 matching drivers with riders?



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 248

1 DR. LINDSEY CAMERON

2 A. Yes.

3 MS. POLLOCK: Object to form.

4 THE WITNESS: I see it as one of  
5 the ways tracking drivers' locations is  
6 used.

7 BY MR. WYATT:

8 Q. Okay. One of the ways is, it  
9 create the opportunities for riders and drivers  
10 to connect, right?

11 A. Yes. That is one of the ways.

12 Q. Okay. And in that sense, at  
13 least, it's not exerting control over the  
14 drivers, correct?

15 MS. POLLOCK: Object to form.

16 THE WITNESS: No. It's  
17 definitely exerting control.

18 BY MR. WYATT:

19 Q. Well, let me ask it differently.  
20 In that way, it's benefitting  
21 drivers by creating opportunities to connect  
22 with riders, correct?

23 MS. POLLOCK: Object to form.

24 THE WITNESS: I try to stay  
25 neutral.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 249

1 DR. LINDSEY CAMERON

2 I say it's matching the drivers,  
3 because they're tracking locations and  
4 that's a form of control.

5 BY MR. WYATT:

6 Q. Okay. But in your prior  
7 writings, you have referred to these aspects of  
8 the platform as benefits to drivers, correct?

9 A. I don't believe I talked about  
10 matching as being a benefit for drivers.

11 Q. Oh, okay.

12 But you have talked about  
13 benefits to drivers in prior writing, I think  
14 that's what we're looking at, right?

15 A. Yeah. I mean there are benefits  
16 that Uber driving has for drivers. Definitely.

17 Q. Okay. Okay.

18 In Paragraph 45, you refer to,  
19 "often workers are unaware of the changes  
20 accomplished by the algorithmic management  
21 system and their implications for their  
22 economic livelihood", right?

23 A. Correct.

24 Q. And then, "Ride-Hailing  
25 companies, can and often do instantly suspend

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 250

1 DR. LINDSEY CAMERON

2 driver's access to the app or sign them a less  
3 profitable ride after a customer complaint,  
4 even before the complaint is investigated",  
5 correct?

6 A. Yes.

7 Q. And we talked about that a  
8 little bit earlier, right?

9 A. Correct.

10 Q. And you cite your own research  
11 here and we've referred to this article a  
12 couple times today, right, Cameron 2022?

13 A. Yes. I mean, that's my own  
14 research, but I also have seen evidence of that  
15 in some of the documents I reviewed for other  
16 cases.

17 Q. Okay. And we talked about some  
18 of the examples earlier, right?

19 A. Yes.

20 Q. And there was one example,  
21 right, we don't need to look at it unless you  
22 want to, but there was one example in Cameron  
23 2022 of a driver who was temporarily band from  
24 the platform due to a dubious customer  
25 complaint.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 251

1 DR. LINDSEY CAMERON

2 Do you remember that driver?

3 A. No.

4 Q. I don't think there's more  
5 details about it, so I just wondered if you  
6 remember what the issue was. Okay.

7 And so, one category that we  
8 talked about earlier is that some drivers are  
9 instantly suspended from the platform because  
10 of a safety issue, correct?

11 A. Yes. I believe that can happen.

12 Q. And do you have an opinion on  
13 whether Uber's approach to suspending drivers,  
14 based on safety complaints, is too harsh or not  
15 harsh enough?

16 A. I have no opinion about that.

17 Q. Okay. You do say that instant  
18 deactivation favors the customers over workers,  
19 right?

20 A. I would agree.

21 Q. Okay. And do you think that's  
22 unfair or wrong?

23 MS. POLLOCK: Object to form.

24 Incomplete hypothetical.

25 THE WITNESS: I'm not sure if

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 252

1 DR. LINDSEY CAMERON

2 I -- I think what I mentioned earlier,  
3 it's not so much the question of, like,  
4 is it unfair or wrong.

5 It's more, is there, like -- I  
6 think personally my concern is how is  
7 there a way for drivers to get back on  
8 the app, but like I said, that's more of  
9 a personal thought and not my actual --  
10 it's not what I do my research on.

11 BY MR. WYATT:

12 Q. Okay. And do you think there  
13 are some safety violations severe enough that a  
14 driver should not have an opportunity to get  
15 back on the app?

16 MS. POLLOCK: Object to form.

17 THE WITNESS: My personal  
18 opinion, yes.

19 BY MR. WYATT:

20 Q. Okay. And do you know that  
21 there's an allegation in this case that before  
22 2019, an initial allegation of sexual assault  
23 should have been deemed sufficient to  
24 automatically revoke a drivers' privileges?

25 MS. POLLOCK: Object to form.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 253

1 DR. LINDSEY CAMERON

2 THE WITNESS: No.

3 I don't know that.

4 BY MR. WYATT:

5 Q. Okay. Okay.

6 A. And let me say, maybe it was  
7 mentioned in the documents that I reviewed, but  
8 I don't know that.

9 Q. No. That's fair enough.

10 There's a lot of documents in  
11 this case, so -- but that's not something you  
12 focused on for purposes of your report?

13 Is that fair?

14 A. No. Not at all.

15 Q. And then, I'm going to scoot  
16 ahead a little bit here for this question, in  
17 Paragraph 95, is about the -- the title is  
18 "Uber's Algorithmically Mediated Customer  
19 Ratings System", right?

20 A. Yes.

21 Q. And actually, if we go down a  
22 little bit further to -- (inaudible) -- we have  
23 deactivation and reactivation, right?

24 A. Yes.

25 Q. And one thing you say here is

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 254

1 DR. LINDSEY CAMERON

2 that you -- it looks like this is a quote, but  
3 I can't tell because there's -- I can't tell,  
4 you tell me.

5 It says, "This difficult  
6 deactivation experience is echoed in a survey  
7 of 810 earners, where two-thirds of the report  
8 having been deactivated, the article uses this  
9 term temporary to mean both permanent  
10 deactivation and temporary waitlisting at some  
11 point."

12 Does that quote maybe from this  
13 document here, Uber --

14 A. I would -- I would think most  
15 likely.

16 Q. Okay. Do you know, like, who  
17 these 810 earners were? Was this, like, a  
18 random sample or was this like a group of  
19 people that experienced some kind of issue that  
20 the two-thirds reported having been  
21 deactivated?

22 A. Oh, this would be Uber's data  
23 right here, so we should pull up that document,  
24 because I don't know off the top of my head.

25 Q. Okay. Okay. Fair enough.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 255

1 DR. LINDSEY CAMERON

2 I mean, is it your experience  
3 that two-thirds of drivers have been  
4 deactivated at some point without knowing why?

5 MS. POLLOCK: Object to form.

6 THE WITNESS: So I think the  
7 question you're asking is based on all  
8 the data that I've collected, were  
9 two-thirds of the drivers deactivated  
10 without knowing why?

11 BY MR. WYATT:

12 Q. Right.

13 A. I mean, while I could answer  
14 that question, I don't have a representative  
15 sample, so I'm not sure if that's -- I don't  
16 think it's fair to ask that research question  
17 of my data, because that's not a question my  
18 data could answer with any sort of, you know,  
19 validity or rigor.

20 Q. Okay. Fair enough.

21 A. I think this was a PowerPoint  
22 that I saw that was written by individuals  
23 working at Uber and it was something about how  
24 they were trying to -- I think they were  
25 basically reporting on drivers' experiences.



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 256

1 DR. LINDSEY CAMERON

2 Q. Okay.

3 Going back up to Paragraph 46.

4 We're still on the four ways that algorithmic  
5 control works.

6 And in this one, you write,  
7 "On-demand apps, for example, allow workers to  
8 compete across multiple zones for assignments  
9 and communicate in realtime with customers.  
10 This often results in workers staying online to  
11 work on the app at strange hours, which is  
12 precisely one of the goals of an on-demand  
13 organization."

14 Do you see that?

15 A. Yes.

16 Q. Okay. You're -- you're not  
17 opining here that Uber forces workers to work  
18 at certain hours, correct?

19 A. No. Not the word force.

20 Encourage is a better word.

21 Q. Okay. Encourage. But even if  
22 it encourages drivers to do this, is this still  
23 the drivers' choice, whether to do that or not?

24 MS. POLLOCK: Object to form.

25 THE WITNESS: I think it's

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 257

1 DR. LINDSEY CAMERON

2 really tricky when you're trying to ask  
3 these questions about choice around  
4 schedule flexibility.

5 I think I mentioned earlier, the  
6 majority of rides on the platform are  
7 done by a minority of drivers and so  
8 there's an economic dependence that's on  
9 there.

10 So there is a way about how, if  
11 I need to earn X-amount of money, then  
12 I'm going to be up at 4:00 a.m. to take  
13 people to the airport.

14 BY MR. WYATT:

15 Q. And so that applies to a  
16 minority of drivers is what you're saying, the  
17 20 percent that do 80 percent of the work.

18 Is that right?

19 A. The ones -- yes.

20 The ones that are economically  
21 depended on the work. Yeah.

22 Q. Okay. And so does that not  
23 apply to the 80 percent who do only 20 percent  
24 of the work?

25 MS. POLLOCK: Object to form.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 258

1 DR. LINDSEY CAMERON

2 THE WITNESS: I'm not sure if it  
3 apply -- I -- it could apply to the  
4 80 percent as well.

5 I think I'm more concerned  
6 about -- I tend to think more deeply  
7 about the 20 percent, because that's  
8 where the base, I would say, of Uber --  
9 of Uber's revenue comes from.

10 So it's a question around  
11 intensification of control and I'm saying  
12 when individuals are economically  
13 dependent on the work, there's an  
14 intensification of control as opposed to  
15 those who may not be economically  
16 dependent on the work.

17 BY MR. WYATT:

18 Q. Okay. And then Paragraph 47,  
19 you refer to many on-demand organizations  
20 running experiments on their workers.

21 What do you mean by experiments?

22 A. Oh, well, this is very common on  
23 platform strategy, often because these forms  
24 grow, like, through network effects.

25 They tend not to have a

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 259

1 DR. LINDSEY CAMERON  
2 strategy, like, let's sit in a room and write  
3 out a plan for what we're going to do for the  
4 next six years. They often will run tests on  
5 their networks. I'm going to do a experiment  
6 in Chicago about this neighborhood in Chicago  
7 about raising surges, but not in this  
8 neighborhood of Chicago, and I'm going to  
9 compare the results and then that will inform  
10 my strategy.

11 So it's very much using data  
12 from the workers to drive the -- whatever  
13 control mechanisms are put into place. And I  
14 mean, that's common across any -- company,  
15 including Uber.

16 Q. And is this another thing where  
17 you're not passing a value judgment on the word  
18 experiment, you're just using this to  
19 illustrate a form of control?

20 A. Exactly.  
21 They're called AB testing.

22 Q. Does the word experiment --  
23 experimenting on people, is kind of a charged  
24 phrase, no?

25 A. It's true. It's true. It makes

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 260

1 DR. LINDSEY CAMERON  
2 you think of the Milgram experiments, but no,  
3 this is a form of strategy to run  
4 experimentation on workers.

5 Now, granted you could argue  
6 there's a level of coercion involved because  
7 are there individuals really consenting to it.

8 I mean, there's a concept that  
9 Robin brings up in 2024 called Boilerplate  
10 Creek, that these terms or services change for  
11 workers and they don't have a chance to read  
12 it, they just accept and then the terms of the  
13 experiment has changed again.

14 So there is a way that you could  
15 think about it as being more coercive, but  
16 here -- and so I do talk about workers are  
17 unaware of the specifics of the experiments,  
18 that's true, but overall, this is a form of  
19 strategy.

20 Q. Okay. And in 49, kind of  
21 continuing this concept, I think, you write,  
22 let me find it -- "in ride-hailing, companies  
23 can automate drivers and routes at the city  
24 level in ways that are unobservable to  
25 drivers", correct?

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 261

1 DR. LINDSEY CAMERON

2 A. Correct.

3 And I think that should be  
4 atomize, not automize.

5 Q. Got it. That's a good fix.

6 I wasn't even focused on that.

7 Okay. So atomize drivers in  
8 routes at the city level in ways that are  
9 unobservable to drivers, correct?

10 A. Correct.

11 Q. But drivers are free to take  
12 their own routes if they to want, correct?

13 MS. POLLOCK: Object to form.

14 THE WITNESS: Such -- I mean,  
15 that's a very complex question.

16 So do they have to use the Uber  
17 GPS system? They could possibly use  
18 ways, but if they end up deviating in  
19 some way that's not by their route,  
20 that's not the suggested route, they can  
21 be penalized for this, maybe go -- you  
22 know, they'll be suspected of doing fraud  
23 or maybe the customer will be upset and  
24 ask for a partial refund.

25 So there are ways in which

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 262

1 DR. LINDSEY CAMERON

2 there's a lot of strong encouragement to  
3 take the routes as directed by Uber.

4 BY MR. WYATT:

5 Q. Okay. And what's the source for  
6 the part about the penalties and upset riders?

7 A. I've seen it in other documents  
8 from Uber, that -- in another case about how  
9 drivers were suspected of fraud when they took  
10 routes that were different.

11 Q. Okay. In Paragraph 50 you talk  
12 about how, "Given this -- given that work on  
13 closed labor market platforms is generally  
14 locationally dependent, e.g., completed  
15 in-person, these workers are less likely to be  
16 active in online communities that would grow  
17 information sharing amongst themselves."

18 Do you see that?

19 A. Correct.

20 Q. And is that something that  
21 applies to Uber?

22 A. Yes.

23 Q. But you've also written, right,  
24 about how drivers that you studied did use  
25 online communities to --

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 263

1 DR. LINDSEY CAMERON

2 A. Correct.

3 Q. -- correct?

4 A. Yeah. It's true.

5 So I think the one thing that I  
6 would say is wrong about this sentence, that I  
7 say less likely.

8 And with qualitative research,  
9 you can't really do comparison to say more or  
10 less likely, so that word is probably -- it's  
11 not the best word, but just -- but I would say  
12 in general, I have found more workers on  
13 open-labor market platforms, like Upwork,  
14 active on the forums as opposed to those on  
15 closed-labor market platforms like Uber.

16 But of course, there are still  
17 Uber drivers that are on these forums, I just  
18 tend to think there's a smaller number of them  
19 comparatively as opposed to people who are  
20 doing fully remote online work.

21 Q. Okay. And is that something  
22 you've looked at closely, like, and have seen  
23 studies on or is this just an impression --

24 A. It's just an impression.

25 Q. Okay. And then, let's see.



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 264

1 DR. LINDSEY CAMERON

2 The next section starts on  
3 Page 26, "how on-demand organizations exercise  
4 organizational control through algorithmically  
5 mediated customer control", correct?

6 A. Correct. And I -- I want to  
7 say, it's an impression, but I just want to  
8 give a sense that it is a fair amount of  
9 research. I think I have an example in  
10 Cameron 2022, like I say out of 63 drivers,  
11 maybe 15 were on forums or something like that.

12 And I wrote a paper comparing  
13 Upwork and Uber and it was, like, you know,  
14 every Uber -- every Upwork person was on an  
15 online forum.

16 So when I say my -- I mean,  
17 there's just a difference when you're doing  
18 online work and you're always on a computer  
19 versus in-person.

20 So I just want to give a sense,  
21 like, it is an impression, I haven't written an  
22 empirical research study on it, but it's one  
23 that I think is grounded in a fair amount of  
24 research.

25 Q. Okay. In 54 you write,

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 265

1 DR. LINDSEY CAMERON

2 "on-demand organizations are unique in the  
3 extent to which they outsource performance  
4 management to customers and use algorithmic  
5 management to collect data and then influence  
6 worker behavior", correct?

7 A. Correct.

8 Q. Does customer feedback -- not in  
9 the on-demand economy, not affect -- let me  
10 start over, too many notes.

11 So somebody -- for a worker not  
12 in the on-demand economy, are they influenced  
13 by customer feedback?

14 A. Yes. They are.

15 Q. Okay. And how is it -- how --  
16 how is it uniquely more so the case in  
17 on-demand organizations?

18 A. So if you read Cameron and  
19 Rothman in 2022, I discuss this in depth, but  
20 what I remember, just sort of at the high  
21 level, it's about how customer -- you think  
22 about a mystery shopper will come into the  
23 store and then they'll say good or bad job of  
24 selling you on these jeans and maybe your  
25 manager will coach you next time to upsell your

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 266

1 DR. LINDSEY CAMERON

2 jeans better.

3 I mean, their invasiveness is  
4 the customer rating, directly influences what  
5 your match is going to be next, or whether or  
6 not you're going to be in this loyalty program  
7 and get a preferred priority matching, or  
8 whether or not you're going to be temporarily  
9 deactivated.

10 So there's a intensification of  
11 inputting customers into the -- the labor  
12 process and this is what Maffie actually calls  
13 laundering control.

14 He says often that  
15 organization -- you know, on-demand companies  
16 say we're not controlling workers, the  
17 customers actually are, but honestly, the  
18 customers are proxy for the organization in  
19 this setting.

20 And, I mean, I talk about more  
21 in this paper -- in this report, that it's more  
22 than just the algorithmic management system,  
23 there's all the normative suggestions that are  
24 in, like, YouTube videos about how to service  
25 customers, so it's like a particular type of --

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 267

1 DR. LINDSEY CAMERON

2 we call them scripts and service rules that  
3 people need to follow.

4 So customers are a very  
5 important mechanism of control in this setting.

6 Q. I guess my question is, isn't it  
7 true in most sales contexts that you need to  
8 please the customer if you want to keep getting  
9 business?

10 A. That is true, if the extent that  
11 I'm arguing is different here, the -- the  
12 intense -- it's an intensification of control  
13 by customers in this setting, along with  
14 quantification that makes the on-demand economy  
15 so distinct.

16 Q. Okay. And that's not something  
17 that's been studied qualitatively, I assume,  
18 this is all qualitative research?

19 A. Let me think.

20 I'm not entirely sure. There is  
21 some quantitative research that's been coming  
22 out. I'm actually a reviewer for a lot of  
23 quantitative pieces. I'm not sure if it looks  
24 at this explicitly, though, so I'm not sure.

25 Q. Okay. Just skimming here.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 268

1 DR. LINDSEY CAMERON

2 Okay. So if we go to --  
3 skipping ahead, Paragraph 60 -- well, so, first  
4 of all, so now we're in the Section C, "How  
5 on-demand organizations influence the behaviors  
6 of customers."

7 Do you see that?

8 A. Correct.

9 Q. Okay. And then Paragraph 63  
10 says, "On-demand organizations also shape  
11 conditions -- the conditions around the service  
12 encounter, such as the location of the service  
13 encounter and the surveillance surrounding it."

14 It goes on to say, "On-demand  
15 organizations also determine any surveillance  
16 and control mechanisms to be used during the  
17 service encounters, such as cameras or audio  
18 recordings."

19 And then it says, "Uber has been  
20 offering subsidized dash cams to workers to  
21 monitor in-car activities."

22 Do you see that?

23 A. Yes.

24 Q. And so, similar questions to  
25 what I asked before.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 269

1 DR. LINDSEY CAMERON

2 Are you taking sort of a  
3 position, good or bad, about the use of dash  
4 cams and other surveillance tools?

5 A. No. It's just another form of  
6 control.

7 Q. Okay.

8 A. Or can be used as a form of  
9 control.

10 Q. Okay. And are you aware --  
11 well, first of all, on the -- in connection  
12 with driving on the Uber platform, are you  
13 aware that use of dash cams is optional?

14 A. Yes. I am aware.

15 Q. And are you aware that the  
16 Plaintiff's theory in this case or one theory  
17 in this case is that Uber should have required  
18 drivers to use dash cams?

19 MS. POLLOCK: Object to form.

20 Incomplete. Lack of foundation.

21 THE WITNESS: No.

22 I didn't know that.

23 BY MR. WYATT:

24 Q. Okay. Okay.

25 And if we go to 64, so next

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 270

1 DR. LINDSEY CAMERON

2 section, "How on-demand companies use  
3 algorithmic management to obfuscate their  
4 organization -- organizational control over  
5 workers", right?

6 A. Yep.

7 Q. And then, the first sentence of  
8 64, "One way that organizations can avoid  
9 fueling worker resentment and resistance, is to  
10 superficially provide workers with a sense of  
11 autonomy while also imposing significant  
12 constraints", right?

13 A. Exactly.

14 Q. And so, what is the sense of  
15 autonomy that you're talking about here?

16 A. Oh, that's every paragraph  
17 that's underneath it. I provide -- there are  
18 many different theoretical words for what this  
19 sense of autonomy is.

20 So I mean, we're looking at one  
21 right now, it's called Confident Confine  
22 Choice, that helps workers feel like they have  
23 a sense of autonomy.

24 One would be cultural narratives  
25 about the drivers think that I'm their own

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 271

1 DR. LINDSEY CAMERON  
2 boss, that gives them a sense of autonomy,  
3 which is linked to schedule flexibility.

4 I think that's one of the key  
5 mechanisms that make the gig economy so  
6 enticing to workers is because it really has  
7 this mechanism of control nailed down.

8 Q. Okay. So creating a sense of  
9 you autonomy, it's part of a -- sorry.

10 Scratch that.

11 Is part of what sense of  
12 autonomy implies that the autonomy is not real?

13 MS. POLLOCK: Object to form.

14 THE WITNESS: Not quite.

15 It's more that the autonomy is  
16 nested within a larger set of control.

17 An example I sometimes use is  
18 like if you offer your child broccoli or  
19 brussel sprouts for dinner, like, they  
20 have a sense of autonomy or choice to  
21 choose, but either way they're eating  
22 green vegetables and you're exerting  
23 parental control.

24 BY MR. WYATT:

25 Q. And how do you measure a



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 272

1 DR. LINDSEY CAMERON

2 drivers' sense of autonomy?

3 A. So I do mostly qualitative  
4 research, so I don't measure anything.

5 Q. Well, how do you evaluate it?

6 A. I also wouldn't say I evaluate.

7 Q. How do you form an  
8 interpretation of it?

9 A. That -- so back earlier when I  
10 talked about -- I'm research -- I'm reading the  
11 transcripts, I'm collecting the data, and I'm  
12 going to literature, and I'm doing this back  
13 and forth area of tacking between coding and  
14 memoing and theory, that's how I'm able to  
15 interpret it.

16 Q. When you did your semistructured  
17 interviews and conversations, is this something  
18 you would ask specifically about, like, do you  
19 feel autonomy in this job?

20 A. Oh, no.

21 You would never do that.

22 Q. Okay. So how do you get at it  
23 if that's a question of interest to you?

24 A. So in qualitative research, you  
25 would never ask someone a leading question like

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 273

1 DR. LINDSEY CAMERON

2 that, because you would get data that was  
3 biased.

4 Back to an earlier conversation  
5 we had about how do you account for bias in  
6 this research, I would ask people, tell me  
7 about your day working, what are some things  
8 you really like about Uber, what are some  
9 things you don't like?

10 So you keep the questions  
11 incredible broad and open-ended and people tell  
12 you what's important to them.

13 Q. Okay.

14 A. But you would -- you would never  
15 ask anyone a question like that.

16 Q. Okay. Skipping ahead here.

17 Give me a minute. Okay.

18 Let's skip up to 66.

19 Gamification. You write, "Another way  
20 organizations obfuscate control is by gamifying  
21 work or applying elements of game playing,  
22 e.g., point scoring, competition with others,  
23 to work activities to encourage workers to work  
24 longer hours.

25 By gamifying work, the work

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 274

1 DR. LINDSEY CAMERON

2 itself becomes more fun and enjoyable while  
3 ensuring that workers' behaviors are aligned  
4 with the organization's interests, with the  
5 result being that workers are controlled."

6 Do you see that?

7 A. Correct.

8 Q. Does it necessarily follow that  
9 the workers are being controlled because they  
10 enjoy playing the games?

11 A. The control comes from the fact  
12 about how the technology is being designed in a  
13 way to entice workers to play the game.

14 And the fact that it's fun keeps  
15 them playing. So it's not because I'm having  
16 fun -- it's a process of how the control  
17 happens. And you might remember there was an  
18 earlier paragraph that we went over how when I  
19 talked about how you can't control people  
20 through sticks, you have to control them  
21 through carrots, and a gamification is one type  
22 of carrots.

23 Q. So just conceptually, just  
24 taking a step back, does control exist anytime,  
25 like, a workers and organizations' interests

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 275

1 DR. LINDSEY CAMERON

2 align in a way that leads the worker to work?

3 MS. POLLOCK: Object to form.

4 THE WITNESS: I think that

5 question is too broad for me to answer.

6 BY MR. WYATT:

7 Q. I guess what I'm asking is, is  
8 there an element I'm missing? Like, does it  
9 have to be something that's created by the  
10 organization with some intent of controlling  
11 the worker or is that not an element of it?

12 A. Actually it doesn't have to be.  
13 So I think in the next part of the paper I talk  
14 about workplace games and that's actually not  
15 organizational derived in the same way that  
16 gamification is.

17 Q. Okay. So control can exist  
18 theoretically without, you know, the  
19 organization even intending to try to control  
20 the worker?

21 MS. POLLOCK: Object to form.

22 THE WITNESS: That is a question  
23 that you can answer, depending on the  
24 level of analysis.

25 So when I talk about the theory

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 276

1 DR. LINDSEY CAMERON

2 of workplace games, I talk about how  
3 there are elements within Uber's -- like  
4 the Uber system, like, the customer in  
5 the app, and the rating system, and how  
6 much money they make on the score card,  
7 which are, like, pieces of how Uber has  
8 purposely designed its system that keeps  
9 workers vested in the game which creates  
10 a source of control.

11 Now, that is a bit different  
12 from gamification, which is, from the  
13 start, designed from the organization.

14 So I'd say in my workplace game  
15 theory, it's less -- it's organizational  
16 adjacent, but it's not organizationally  
17 designed.

18 However, I know people, like  
19 Michael Burroway, would disagree with me,  
20 but he would say that even workplace  
21 games are designed to protect managerial  
22 interest over worker interest and that is  
23 sort of built into the organization, but  
24 he argues at a higher level of analysis  
25 than what I do.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 277

1 DR. LINDSEY CAMERON

2 So it's a complicated answer to  
3 your question or multi-speed, depending  
4 on where you want to draw the line of  
5 analysis at.

6 BY MR. WYATT:

7 Q. Okay. And I guess -- and I  
8 appreciate that. And just returning for a  
9 second to gamification as opposed to workplace  
10 games.

11 Isn't the worker also exercising  
12 some control over how the worker spends his or  
13 her time, for example, by choosing to engage in  
14 gamified activities because they enjoy it?

15 MS. POLLOCK: Object to form.

16 THE WITNESS: Well, this is the  
17 conversation we were having just a little  
18 while ago about how the systems have to  
19 allow for there to be some choice, some  
20 autonomy within the larger system that is  
21 control.

22 So, yes, to your point, yes, I  
23 have some choice because I'm playing this  
24 game and it's fun to sort of have it sort  
25 of accrue the number of points I get, but

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 278

1 DR. LINDSEY CAMERON

2 ultimately, it's in a larger system of  
3 gamification that's meant to drive  
4 workers' behavior in a certain direction.

5 BY MR. WYATT:

6 Q. Would you describe it as a  
7 dance, this balance between -- you know,  
8 exercise and control that -- allowing for  
9 autonomy within that framework?

10 MS. POLLOCK: Object to form.

11 THE WITNESS: I don't think I  
12 quite go with dance, because there's an  
13 definite power and balance here.

14 So I'm not sure if dance is the  
15 right metaphore, but it's dynamic, I would  
16 agree with that.

17 BY MR. WYATT:

18 Q. Okay. And I mean, do you have a  
19 view on whether gamification is a good or a bad  
20 thing or is this just another neutral, that's a  
21 form of control?

22 A. It is another form of control.  
23 I might have slightly more negative feelings  
24 toward gamification because I feel like it  
25 hides a lot of things.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 279

1 DR. LINDSEY CAMERON

2 It obfuscates the control and it  
3 let's people not know that there's a clear  
4 power asymmetry in place. So I don't think I'm  
5 fully neutral on gamification.

6 Q. Okay. We talked earlier about  
7 how 80 percent of the work is done by  
8 20 percent of the drivers -- and this is  
9 actually meant to be quantitative, but the  
10 concept is that most of the work is done by a  
11 few drivers, right?

12 A. Yeah. 80/20 isn't -- like,  
13 that's the general economic principle.  
14 There's -- I've seen the breakdowns in another  
15 case that I've done that just sort of confirms  
16 to the fact the majority of rides are given by  
17 minority drivers, that's the big point I'm  
18 trying to get across.

19 Q. Okay. And so for the majority  
20 of drivers who do the least amount of work, are  
21 they subject to less control?

22 MS. POLLOCK: Object to form.

23 THE WITNESS: I mean, it's an  
24 interesting question, because that's not  
25 how I think about control. I think about



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 280

1 DR. LINDSEY CAMERON  
2 control as more of, like, an  
3 organizational process. It's not so much  
4 how it's exercised on one specific  
5 individual.

6 And I would agree, like I said  
7 earlier, it's intensified for those who  
8 are more economically dependent on the  
9 work, but the problem with your question,  
10 it's a different level of analysis than  
11 what you're asking the question of, of  
12 then what the concept of organizational  
13 control is -- it's not a fair question.

14 BY MR. WYATT:

15 Q. Sorry.  
16 I didn't mean to interrupt you.  
17 Are you done?

18 A. Yeah. I'm done.

19 Q. Okay. I just got excited  
20 because I thought I had a crystallization of  
21 what you were talking about.

22 So are you saying that, like,  
23 what you're doing is more of a description of  
24 the process -- or an organizational process, or  
25 less about measuring the impact on specific

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 281

1 DR. LINDSEY CAMERON

2 progress?

3 MS. POLLOCK: Object to form.

4 THE WITNESS: If by specific  
5 driver, do you mean, like, Joe in Newark,  
6 New Jersey?

7 BY MR. WYATT:

8 Q. It could be Joe or it could be  
9 groups of drivers. I'm just trying to  
10 understand, it sounds like you're focussed on  
11 the process within the organization and less  
12 about how it actually manifests on the drivers  
13 as a group.

14 Is that --

15 A. I would -- I would say, in  
16 general, it's a process on how it affects  
17 drivers across the board, from, like, Alaska to  
18 Maine.

19 And then there is data in the  
20 five Bellwether cases where I show what it  
21 looks like for these five specific drivers, but  
22 the bulk of my theory or the bulk of the --  
23 it's about this it how it works for Uber as a  
24 system.

25 Q. Okay. I'm almost done, so I

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 282

1 DR. LINDSEY CAMERON  
2 would suggest we keep going, if that works for  
3 you? I think I've got just a few questions  
4 left.

5 A. I'm great.

6 Q. Okay. If we go to section --

7 MS. POLLOCK: What does, what  
8 does almost done mean?

9 MR. WYATT: I've got -- I've  
10 got --

11 MS. POLLOCK: I've seen lawyers  
12 disagree.

13 MR. WYATT: I've got one page of  
14 an outline left.

15 MS. POLLOCK: Oh, okay. Great.

16 MR. WYATT: Of an eight-page  
17 outline.

18 MS. POLLOCK: Understood.

19 We're good.

20 MR. WYATT: Okay.

21 BY MR. WYATT:

22 Q. Okay. Section 9, "How Uber uses  
23 algorithmic management to exercise  
24 organizational control over their workers and  
25 influence their customers."

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 283

1 DR. LINDSEY CAMERON

2 Do you see that?

3 A. Yes.

4 Q. Okay. And then, there's two  
5 sections -- two Subsections, A, "Uber as the  
6 quintessential on-demand organization," as one,  
7 right?

8 A. Correct.

9 Q. And then the next one is, B,  
10 "The usage of general and detailed control by  
11 Uber by its algorithmic management system",  
12 correct?

13 A. Yes.

14 Q. Okay. And then, in -- in this  
15 section, you -- you -- you say you discuss five  
16 different components of their -- of Uber's  
17 algorithmic management system, correct?

18 A. Correct.

19 Q. And it's matching, up-front  
20 pricing, loyalty programs, incentives and  
21 geotracking, right?

22 A. Correct.

23 Q. Okay. And then, starting -- we  
24 discussed the first two.

25 And then in Paragraph 90, you

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 284

1 DR. LINDSEY CAMERON

2 get to loyalty programs, right?

3 A. Correct.

4 Q. Okay. Are you relying on any of  
5 your own prior research, outside of litigation,  
6 for your opinions on the loyalty programs?

7 MS. POLLOCK: Object to form.

8 THE WITNESS: I'm thinking.

9 So there's a sentence that says,  
10 "unlike consumer loyalty programs, such  
11 as airline rewards, these programs accept  
12 workers granular interactions", that's  
13 definitely an intellectual thought of  
14 mine, but I feel like the majority of  
15 this has come from case documents. Yeah.

16 BY MR. WYATT:

17 Q. And yet that puts a finger on  
18 the what -- kind of prompt to my question. I  
19 do see citations in this section to litigation  
20 documents and literature.

21 A. Uh-huh.

22 Q. But none of the literature  
23 citations were to your literature, so I'm just  
24 trying to draw lines in my own head between  
25 which opinions are anchored in your -- you

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 285

1 DR. LINDSEY CAMERON

2 know, your academic work versus what you've  
3 read for this case.

4 So in this section, this is a  
5 thought that you identify as sort of  
6 preexisting, this report of yours, but the rest  
7 of it is largely based on litigation documents  
8 and other people's research?

9 A. So this entire section of the  
10 report, not just these two paragraphs, is -- I  
11 try to rely much more on case documents and not  
12 my own research.

13 I have had these thoughts about  
14 loyalty programs well before this case. I've  
15 had it since the very first case, but I just --  
16 that was data that I think I didn't -- I got  
17 better quality data about that from case  
18 documents, starting with my very first case I  
19 did a few years ago.

20 Q. Okay. But again, to the extent  
21 you're relying on litigation materials here,  
22 you're only citing materials from this case,  
23 correct?

24 A. Correct.

25 But the Massachusetts case had a

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 286

1 DR. LINDSEY CAMERON

2 lot of data about this and it was very core to  
3 sort of forming my opinion and how to think  
4 about this, so I feel very confident about this  
5 section.

6 There wasn't the same amount of  
7 high-quality data about the loyalty program in  
8 this -- this set of documents.

9 Q. Okay. Looking ahead to 93, I  
10 just -- I kind of had the same question on a  
11 couple of these sections.

12 So 93, the incentives, same  
13 thing, like, you're not relying here on your  
14 prior published work, correct?

15 A. Well, that's really not a fair  
16 statement, though. There's no way I could have  
17 written this section of the report if I hadn't  
18 been studying Uber for the past ten years.

19 So that there's so much general  
20 knowledge I have about this company and knowing  
21 this research, it would be impossible, there's  
22 no way I could have written this.

23 So I am relying on all this, on  
24 all my background knowledge to write this  
25 section of the report, even though the

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 287

1 DR. LINDSEY CAMERON

2 citations are just to this specific case.

3 Q. So I -- I hear what you're  
4 saying, but I guess my question is a little bit  
5 narrower than that.

6 You're not relying on any of the  
7 published work that you've done for this  
8 incentive piece specifically, right?

9 Unless I missed one?

10 A. Am I citing my research? No.

11 But could I have written the  
12 goal of my incentives is to induce drivers to  
13 work for longer hours, oftentimes preferred by  
14 Uber and continue working for Uber over the  
15 long-term.

16 I mean, that is things I've  
17 talked about in Cameron 2024, in Cameron and  
18 Rothman 2022. Like, I had these ideas in my  
19 other research papers, even if they're not  
20 explicitly cited here, because they're not --  
21 this isn't -- it's -- it's -- these are almost  
22 like -- (inaudible) -- to me, what I'm citing  
23 in here, as opposed to the theory I'm citing  
24 from my other papers.

25 Q. And are incentives something,



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 288

1 DR. LINDSEY CAMERON

2 like, is that a topic that was covered in some  
3 of your original research with drivers, like --

4 A. Yeah. Cameron 2024, there's a  
5 whole section on incentives.

6 Q. But is that something that came  
7 up in your interviews with drivers?

8 A. Yeah.

9 Came up in my interviews, came  
10 up in my cargo data, came up in the online  
11 form, came up as me as driving.

12 Q. Okay. And then, the importance  
13 of Uber Pro plan and realtime incentives, is  
14 that also something that would have come up in  
15 research or did you get that specific about it?

16 MS. POLLOCK: Object to form.

17 THE WITNESS: I'm thinking.

18 The pay, overall pay is  
19 important and in fact satisfaction, that  
20 was important in, like -- it came out in  
21 the early draft that didn't get  
22 published, the paper changed and so that  
23 it didn't come in.

24 But I remember thinking about  
25 pay, because remember I talked about how

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 289

1 DR. LINDSEY CAMERON

2 I made all those categories as I was  
3 content coding the data?

4 There's an early category I had  
5 around pay and the thing is it wasn't as  
6 theoretically interesting, which is why  
7 it ends up not being in the report, or it  
8 doesn't end up being in my published  
9 research, but it's something I've been  
10 thinking about.

11 The same with B, "The ability to  
12 earn income plays a role whether people  
13 sign up to drive. If you read Cameron,  
14 2022, and the boundary conditions and  
15 future research, I talk about it.

16 What I'm getting at is, like,  
17 empirically what is -- on all these cites  
18 here that we have from the data case is  
19 not the same what researchers find  
20 theoretically interesting.

21 So I've thought many of these  
22 ideas before, but they're not the core of  
23 what informed my theoretical argument.

24 So, yeah.

25 BY MR. WYATT:

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 290

1 DR. LINDSEY CAMERON

2 Q. Okay. That's all I'm trying to  
3 figure out. Is this something that came up in  
4 your experience or is it being pulled from the  
5 documents or both?

6 A. I would say the loyalty program  
7 data is the one that I really relied on case  
8 documents the most.

9 Q. Okay.  
10 And then 95, rating system.  
11 Is this also something that was  
12 explored in your published work?

13 A. Yeah. Cameron and Rothman,  
14 2022, is all about the customer rating system.

15 Q. Okay. And I did see that cite  
16 in this section.

17 95, F, Deactivation and  
18 Revisitation, we talked about that. I know  
19 that's covered in your --

20 A. Yeah.

21 Q. -- work.  
22 96, Experimentation, we talked  
23 about that --

24 A. I don't talk about that -- I  
25 don't talk about that very much in my research,

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Page 291

1 DR. LINDSEY CAMERON

2 the experimenting.

3 Q. Okay. And what about  
4 geotracking and monitoring?

5 A. Yeah. It's in Cameron, 2024.

6 Q. Okay.

7 MR. WYATT: Okay.

8 I have no further questions.

9 MS. POLLOCK: All right.

10 We can go off the record,  
11 please.

12 THE VIDEOGRAPHER: Going off the  
13 video record. Time is 7:39 p.m.

14 - - -

15 (Whereupon, a recess took place  
16 from 7:39 p.m. to 7:42 p.m.).

17 - - -

18 THE VIDEOGRAPHER: We are back  
19 on the video record.

20 The time is 7:42 p.m.

21 - - -

22 EXAMINATION

23 - - -

24 BY MS. POLLOCK:

25 Q. Dr. Cameron, I have the

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 292

1 DR. LINDSEY CAMERON

2 opportunity to just ask you a couple of  
3 follow-up questions from questions that you  
4 were asked by counsel for Uber.

5 First, I want to direct your  
6 attention to Paragraph 7 of your expert report,  
7 which you can see before you on the screen.

8 A. Yes.

9 Q. All right.

10 And you were asked in the second  
11 sentence of Paragraph 7, about whether this  
12 sentence was a fair summary of your methodology  
13 in this case.

14 Do you recall that question?

15 A. Yes.

16 Q. All right.

17 And were there other steps  
18 involved in your methodology in this case that  
19 were -- are not described in this sentence?

20 A. By the word in-depth and  
21 observation, it's more than just I drove for  
22 Uber for 100 hours.

23 It includes, you know, I've  
24 interviewed people longitudinally for seven  
25 years, -- data, online forums, public documents

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 293

1 DR. LINDSEY CAMERON  
2 from Uber for SIs to advertisements to  
3 promotional materials, just scraping the web  
4 forums for the past ten years.

5 So when I mean emerging, it's  
6 not just me driving, it's, like, you know, it's  
7 really what I've eat, lived, breathed for the  
8 past ten years.

9 And then to think of the last  
10 thing, to see things from the experiential view  
11 of actors in this field doesn't mean that  
12 workers say I like apples and then you just  
13 take it as face value that they like apples.

14 Like, there's a whole amount of  
15 scientific evidence that you create because you  
16 do this emergence, it allows to you extract or  
17 theorize much broader than someone's  
18 individual's experience.

19 Q. As part of your methodology in  
20 this case, did you take the opportunity to  
21 review other published literature?

22 A. Yes. I read a fair amount of  
23 outside literature for this case.

24 Q. All right.

25 MS. POLLOCK: I have no further

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Page 294

1 DR. LINDSEY CAMERON

2 questions.

3 MR. WYATT: Nothing from me  
4 either. Thank you for your time.

5 MS. POLLOCK: Happy birthday.

6 THE WITNESS: Yeah.  
7 Happy birthday.

8 THE VIDEOGRAPHER: Going off the  
9 video record. The time is 7:44 p.m.

10 THE COURT REPORTER: I'll start  
11 with Jeff, my understanding is you would  
12 like the final November 14th, and a rough  
13 draft?

14 MR. WYATT: Yeah. As soon as  
15 possible on the rough. Sorry.

16 MS. POLLOCK: Yes. Please.

17 - - -

18 (DR. LINDSEY CAMERON was  
19 excused.)

20 - - -

21 (Deposition concluded at  
22 7:44 p.m.)

23

24

25

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Page 295

DR. LINDSEY CAMERON  
C E R T I F I C A T E

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF PHILADELPHIA:

I, Beau Dillard, RPR, a Notary Public within and for the County and State aforesaid, do hereby certify that the foregoing deposition of DR. LINDSEY CAMERON was taken before me, pursuant to notice, at the time and place indicated; that said deponent was by me duly sworn to tell the truth, the whole truth, and nothing but the truth; that the testimony of said deponent was correctly recorded in machine shorthand by me and thereafter transcribed under my supervision with computer-aided transcription; that the deposition is a true record of the testimony given by the witness; and that I am neither of counsel nor kin to any party in said action, nor interested in the outcome thereof.

WITNESS my hand and official seal this  
14th day of November, 2025.



Beau Dillard, RPR  
Notary Public



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Page 296

DR. LINDSEY CAMERON  
INSTRUCTIONS TO WITNESS

Please read your deposition over  
carefully and make any necessary corrections.  
You should state the reason in the appropriate  
space on the errata sheet for any corrections  
that are made.

After doing so, please sign the errata  
sheet and date it.

You are signing same subject to the  
changes you have noted on the errata sheet,  
which will be attached to your deposition.

It is imperative that you return the  
original errata sheet to the deposing attorney  
within thirty (30) days of receipt of the  
deposition transcript by you. If you fail to  
do so, the deposition transcript may be deemed  
to be accurate and may be used in court.

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Page 297

1 DR. LINDSEY CAMERON

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3 E R R A T A

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5 PAGE LINE CHANGE

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16 Reason for Change:

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HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 298

DR. LINDSEY CAMERON

ACKNOWLEDGMENT OF DEPONENT

I, \_\_\_\_\_, do hereby  
certify that I have read the foregoing pages \_\_\_\_  
to \_\_\_\_ and that the same is a correct  
transcription of the answers given by me to the  
questions therein propounded, except for the  
corrections or changes in form or substance, if  
any, noted in the attached Errata Sheet.

\_\_\_\_\_  
DATE

\_\_\_\_\_  
SIGNATURE

Subscribed and sworn to before  
me this \_\_\_\_\_ day of \_\_\_\_\_,  
2025.

My commission expires:

\_\_\_\_\_  
Notary Public

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[&amp; - 2024]

Page 1

<b>&amp;</b>	<b>100</b> 292:22	<b>184</b> 5:8	<b>2019</b> 13:10
<b>&amp;</b> 2:8 9:7 183:11,13 185:17 188:6,8 188:15,16	<b>11</b> 3:13 4:20 156:15,18 <b>114</b> 4:14 <b>12</b> 5:3 24:3,4 24:11,16 53:14 162:19,22	<b>1967</b> 183:11 188:7 <b>1995</b> 190:10	57:7,11,15,19 58:7 138:23 252:22
<b>0</b>		<b>2</b>	<b>202-389-3393</b>
<b>003</b> 4:23 <b>01</b> 3:12 <b>02</b> 3:15 <b>03</b> 3:18 <b>03084</b> 1:6 <b>03a</b> 3:22 <b>03b</b> 4:3 <b>05</b> 4:9 200:14 200:20 <b>07</b> 4:13 <b>09</b> 4:20	<b>12th</b> 1:16 8:6 <b>13</b> 4:16 5:6 60:24 71:16 184:15,20 <b>1301</b> 2:10 <b>14</b> 76:20 120:25 121:7 121:21 122:18 124:8,11 127:10 <b>142</b> 4:18 <b>14th</b> 294:12 295:15	<b>2</b> 3:15,23 18:22 18:25 19:4 28:3,6,8 29:4 32:6,7 63:6 70:9 84:10 123:11,12 <b>20</b> 20:11 27:18 29:7,13 257:17 257:23 258:7 279:8 <b>20004</b> 2:10 <b>2001</b> 188:11 <b>2003</b> 208:3 <b>2006</b> 67:24 188:12 <b>2008</b> 67:23 157:9,17 <b>2009</b> 235:19 <b>2013</b> 111:9 203:8 230:10 237:13 <b>2015</b> 230:12 <b>2016</b> 111:21 <b>2017</b> 33:14 117:12 <b>2018</b> 4:21 13:11 157:16 157:19	2:11 <b>2020</b> 13:10 111:6 112:14 112:16,19,23 112:25 113:3 226:18 <b>2021</b> 4:9 57:15 57:20 58:7,25 59:18 65:22 72:11 169:25 <b>2022</b> 105:14 138:24 193:17 193:18 195:14 203:25 205:25 207:12 250:12 250:23 264:10 265:19 287:18 289:14 290:14 <b>2023</b> 13:21 15:11 142:19 237:13 <b>2024</b> 20:16,21 21:3,11,18 54:8 55:2 64:10 85:6 164:21 168:15 197:14 225:21 260:9 287:17 288:4 291:5
<b>1</b>	<b>1</b> 3:12 6:15 8:7 11:12,16 12:11 26:24 29:4 31:18 35:12 52:21 55:14 60:12 85:16 123:12 206:20 <b>10</b> 4:16 5:3 24:3,4,11,16 51:15 101:10 142:4,8 194:3 194:13 204:16 210:5 234:13		

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[2025 - 90s]

Page 2

<b>2025</b> 1:16 8:6 11:25 19:9 20:17,22 21:19 22:2,9,15,17,21 23:2,15 295:15 298:17 <b>20250926</b> 5:3 <b>20251024</b> 3:12 <b>20251105</b> 3:18 <b>20251110</b> 4:3 <b>207</b> 186:22 <b>20s</b> 29:10 <b>21851</b> 295:18 <b>22</b> 6:11 24:14 <b>22nd</b> 20:17 23:22 24:2 <b>23-03084</b> 5:4 <b>23rd</b> 85:6 <b>24th</b> 11:25 20:14 <b>25</b> 3:20 121:8 122:18 127:10 <b>26</b> 121:14 212:10,12 264:3 <b>26th</b> 19:9 20:5 <b>27</b> 3:23 212:10 212:16,20 213:18 <b>28</b> 212:10 214:14 <b>29</b> 163:7 218:16	<b>291</b> 3:7 <b>2:13</b> 1:17 8:5 <b>2:15</b> 10:24 11:4 <b>2:16</b> 11:4,8 <b>3</b> <b>3</b> 3:18 25:15,19 35:2 85:24 121:3 158:17 <b>30</b> 4:5 296:16 <b>32</b> 4:7 228:10 <b>35</b> 231:10 <b>36</b> 161:18 <b>37</b> 239:3,13 <b>3:23</b> 1:6 <b>3:25</b> 84:3,6 <b>3:28</b> 84:6 <b>4</b> <b>4</b> 3:22 27:8,12 35:17 37:9,13 96:6 97:15 218:5 <b>40</b> 6:11 <b>41</b> 240:9 <b>42</b> 91:12 <b>43</b> 243:21 244:3 <b>44</b> 245:10 247:13 <b>45</b> 249:18 <b>46</b> 256:3 <b>47</b> 258:18 <b>49</b> 260:20	<b>4:00</b> 257:12 <b>4:49</b> 158:9,12 <b>5</b> <b>5</b> 4:3 30:13,17 34:25 36:23 96:12 <b>50</b> 115:2 231:15 262:11 <b>500</b> 201:17 <b>54</b> 264:25 <b>58.5</b> 20:20 21:16 23:17 <b>59</b> 4:9 <b>5:04</b> 158:12,16 <b>6</b> <b>6</b> 4:7 33:2,7 38:10 87:20 <b>60</b> 12:4 268:3 <b>618-259-2222</b> 2:6 <b>62002</b> 2:5 <b>63</b> 264:10 268:9 <b>64</b> 269:25 270:8 <b>66</b> 273:18 <b>6:05</b> 217:21,24 <b>6:20</b> 217:24 218:4 <b>6apr</b> 4:7 <b>6th</b> 33:14	<b>7</b>
			<b>7</b> 4:9 6:15 38:23 50:24 51:18 52:25 59:9,12 85:24 86:3 87:25 99:17 176:19 292:6,11 <b>7,500</b> 19:22 <b>77</b> 67:22 <b>7:39</b> 291:13,16 <b>7:42</b> 291:16,20 <b>7:44</b> 294:9,22
			<b>8</b>
			<b>8</b> 4:11 41:13 50:24 84:19,24 85:24 86:7 94:11 199:4 <b>80</b> 257:17,23 258:4 279:7 <b>80/20</b> 279:12 <b>810</b> 254:7,17 <b>84</b> 4:11 <b>86</b> 91:11
			<b>9</b>
			<b>9</b> 3:6 4:13 50:15 51:8 114:10,15 282:22 <b>90</b> 283:25 <b>90s</b> 188:9,17

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[93 - actually]

Page 3

<b>93</b> 286:9,12	103:17 106:22	193:2 273:5	67:7 102:3
<b>95</b> 253:17	<b>academic</b> 87:5	<b>accounts</b>	153:25 193:19
290:10,17	109:21 124:14	144:12	252:9
<b>96</b> 231:15	124:20 128:4	<b>accrue</b> 277:25	<b>actually</b> 14:23
290:22	130:8 132:10	<b>accuracy</b>	26:21 33:25
<b>98</b> 121:15	152:12 155:16	131:18	37:17 41:4
<b>99</b> 139:13	157:10,25	<b>accurate</b> 12:13	42:25 52:7
<b>a</b>	212:13 214:17	17:8 20:23	66:17 67:4,12
	216:16 285:2	125:15 169:12	67:25 69:20
<b>a.m.</b> 257:12	<b>academics</b>	186:6 211:10	80:10 83:4
<b>ab</b> 259:21	13:16,17	296:19	94:3 104:13
<b>ability</b> 155:2	<b>acceleration</b>	<b>accurately</b>	107:23 108:5
187:8 289:11	225:4 246:4	235:20	109:7 112:24
<b>able</b> 59:20	<b>accept</b> 260:12	<b>accused</b> 80:3	116:22 121:22
67:25 71:2,24	284:11	<b>acknowledge</b>	121:22 122:6
72:5 120:17	<b>acceptable</b>	7:4,9 124:15	123:5,11
125:15 126:13	54:21 82:22	<b>acknowledg...</b>	128:17 140:23
126:16,17,22	<b>accepted</b> 27:24	298:2	145:21 147:6
148:10,11	28:17 29:4	<b>act</b> 144:14	149:11 150:16
168:23 170:7	106:15,23	<b>action</b> 27:2	150:17 155:22
171:18 228:5	231:6	35:21 37:2	157:12 160:4
230:4,5 272:14	<b>accepting</b>	39:2 50:17	160:20 167:2
<b>above</b> 7:16	225:5	51:5,17 295:13	167:14 175:8
163:9 200:11	<b>access</b> 71:9	<b>actions</b> 201:5	176:22 190:5,8
<b>abstract</b> 104:16	93:2 179:19	<b>active</b> 262:16	194:9 207:25
138:6 140:14	180:3 222:2,3	263:14	208:10 219:23
189:7	250:2	<b>activities</b>	220:3 226:20
<b>abstraction</b>	<b>accessible</b> 39:6	161:22 228:15	226:22 231:4
216:8	<b>accident</b> 34:19	268:21 273:23	232:8,13 242:3
<b>abstractly</b>	76:15 80:9	277:14	253:21 266:12
134:4	<b>accomplished</b>	<b>actors</b> 177:7	266:17 267:22
<b>abstracts</b> 32:8	249:20	293:11	275:12,14
<b>academia</b>	<b>account</b> 71:2	<b>actual</b> 13:16	279:9 281:12
102:19 103:12	191:6,13,16,25	24:12 44:2	

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[add - allowed]

Page 4

<b>add</b> 36:17 118:13 120:14 233:13	<b>advance</b> 206:9 <b>advertisements</b> 293:2	<b>ahead</b> 37:20 98:20 125:22 130:12 187:15	224:13 225:10 225:24 226:19 234:12 235:14
<b>added</b> 14:11 27:21	<b>affect</b> 198:16 265:9	233:2 253:16 268:3 273:16 286:9	235:20 236:2,4 236:10,14,25 237:2 240:25
<b>addition</b> 32:18 207:20	<b>affected</b> 196:13 196:17	<b>aided</b> 295:11	241:8 242:3,17 243:8,22
<b>additional</b> 12:23 14:9,10 20:4 32:18 38:5	<b>affects</b> 281:16 <b>affiliated</b> 98:23 <b>affiliations</b> 8:20	<b>airline</b> 284:11 <b>airport</b> 257:13 <b>alaska</b> 281:17 <b>alex</b> 150:23 <b>algorithm</b> 144:14 197:13 197:22 198:18 223:15 224:8 224:19 225:19 240:15,17,21 241:14 242:11 247:24	245:12 249:20 256:4 265:4 266:22 270:3 282:23 283:11 283:17
<b>address</b> 83:17 120:6,9	<b>aforsaid</b> 295:6 <b>afternoon</b> 8:4 9:18,19,24	<b>algorithmic</b> 4:16 41:22 64:12 66:5,11 66:13 74:7 88:13,22 89:15 92:12 116:13 116:18,22 122:2 142:19 142:19 144:3,7 144:13 165:2 167:11 170:24 173:4 193:4,24 194:4,15,18 195:7,12,16 197:17 215:13	<b>algorithmically</b> 253:18 264:4 <b>algorithms</b> 63:12 66:8,9 227:14 240:14 240:20,21,23 241:19 242:12 245:17
<b>addressed</b> 89:17	<b>ag</b> 90:9		<b>align</b> 66:20 275:2
<b>addressing</b> 89:11 95:6 130:24	<b>ago</b> 15:14 30:4 55:18 170:18 277:18 285:19		<b>aligned</b> 274:3 <b>aligns</b> 67:19 161:20
<b>adherence</b> 245:19	<b>agree</b> 64:22 122:16 124:2 145:5 151:25 165:17 166:8 167:16 185:10 186:11 189:9 190:20 194:23 195:22 196:11 219:7 221:3,13 222:12,15,21 251:20 278:16 280:6		<b>allegation</b> 252:21,22 <b>allegations</b> 95:21
<b>adjacent</b> 234:15 276:16	<b>agreed</b> 7:18 <b>agreement</b> 7:16 37:24 50:2,5 222:2		<b>allow</b> 256:7 277:19
<b>adjudicate</b> 81:23			<b>allowed</b> 187:19
<b>adjustment</b> 236:9			
<b>administered</b> 7:10,11			
<b>administrative</b> 64:10			
<b>admissibility</b> 128:15			
<b>adopt</b> 144:8			

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[allowing - apply]

Page 5

<b>allowing</b> 278:8	215:24	187:16 195:8	173:3 197:7
<b>allows</b> 103:6,20 293:16	<b>analyze</b> 177:19 204:4,6 206:25	209:8 213:8 225:15 227:8	220:24 221:4,5 221:5,6,13
<b>altercation</b> 81:12	213:21,24	233:11 234:5	222:13,24
<b>alton</b> 2:5	<b>anchored</b> 284:25	237:11 244:18	223:11 238:20
<b>amenable</b> 240:20	<b>anecdotal</b> 131:16,21	255:13,18 275:5,23 277:2	242:12,19 250:2 252:8,15
<b>america</b> 139:20 208:23 210:3,6 211:18	132:18 133:15 154:7 207:18 207:23 208:16	<b>answered</b> 213:9	256:11 276:5
<b>amount</b> 160:7 163:11 164:6 165:14,20 166:10,18,21 173:4 208:14 226:17,24 257:11 264:8 264:23 279:20 286:6 293:14 293:22	<b>anecdotal</b> 208:20	<b>answering</b> 186:21	<b>appeal</b> 78:9
<b>amount26aug...</b> 3:16	<b>angle</b> 195:17	<b>answers</b> 16:7 16:20 78:25 298:6	<b>appealing</b> 151:7
<b>analyses</b> 41:16 177:16	<b>anna</b> 2:4 9:2 17:25 22:13 34:4 52:14 54:20 55:6	<b>anthropologists</b> 183:15	<b>appearances</b> 8:20
<b>analysis</b> 76:8 124:12 136:17 143:22 184:10 199:7 215:18 275:24 276:24 277:5 280:10	<b>anne</b> 159:11	<b>antibe</b> 67:22,24	<b>appeared</b> 60:15
<b>analyst</b> 110:17	<b>annual</b> 231:15	<b>anticipates</b> 40:14	<b>appearing</b> 58:5
<b>analytical</b> 131:17 214:16	<b>answer</b> 6:4 16:22 17:13 54:21 56:10 65:9,14 69:2 70:2 72:20 73:16,25 81:17 82:22 83:2 106:19 107:6 123:22,23 126:5 128:25 129:4 132:22 133:8 136:18 140:12 162:11 170:8 175:4,9	<b>anybody</b> 17:23 18:3 48:17 118:8,12	<b>appendix</b> 192:5
		<b>anymore</b> 196:8 196:25	<b>apples</b> 293:12 293:13
		<b>anytime</b> 274:24	<b>applicable</b> 141:16
		<b>anyway</b> 77:16	<b>application</b> 47:10 220:24
		<b>apart</b> 38:20	<b>applied</b> 237:9
		<b>app</b> 72:23 163:12 166:10 166:20 167:3 167:17,23 168:4,17 170:20,23 172:10,13	<b>applies</b> 146:17 200:5 229:16 239:19,23 240:12 241:8 241:11 257:15 262:21
			<b>apply</b> 71:3 128:3 146:19 196:24 218:23 233:9 237:7,8 241:5,14



## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[apply - assume]

Page 6

257:23 258:3,3 <b>applying</b> 273:21 <b>appointment</b> 97:15,21 <b>appraisals</b> 96:22 <b>appreciate</b> 30:8 82:6 87:9 94:7 117:17 118:15 240:2 277:8 <b>approach</b> 74:3 147:20 199:5 206:23 213:24 214:8 251:13 <b>approaches</b> 130:7 234:15 <b>appropriate</b> 87:6 170:8 193:22 296:6 <b>appropriately</b> 48:13 <b>approval</b> 47:20 <b>approved</b> 44:6 115:9 <b>approximately</b> 113:5 <b>apps</b> 256:7 <b>april</b> 33:14 <b>arabic</b> 110:22 <b>arbitrary</b> 200:20 <b>architectural</b> 195:4	<b>archival</b> 76:3 133:12 134:10 147:15 179:18 208:19 <b>area</b> 41:21 82:16 237:12 272:13 <b>areas</b> 113:6 195:6 230:5 <b>argo</b> 94:4 <b>argue</b> 137:12 169:13 260:5 <b>argues</b> 242:17 276:24 <b>arguing</b> 267:11 <b>argument</b> 13:25 14:23 34:2 61:23,25 127:18 193:10 197:6,16 241:22 289:23 <b>argumentation</b> 242:25 <b>argumentative</b> 153:20 <b>arguments</b> 120:12 121:4 180:17 181:5 <b>arizona</b> 209:3 <b>arrangement</b> 7:13 95:12 <b>arrangements</b> 56:20 61:2,15 62:3	<b>arrests</b> 76:20 <b>arrival</b> 225:6 <b>arriving</b> 114:11 <b>article</b> 32:11 49:20 64:11 107:23 142:13 142:16 148:19 155:25 157:2,6 157:8 164:17 173:21 184:23 187:9,25 188:24 189:6 190:16 194:4 196:23 231:5 234:11,12 244:21 250:11 254:8 <b>articles</b> 32:8 42:22,23 125:7 244:19 245:2 <b>artifact</b> 91:14 91:24 92:20 <b>artifacts</b> 92:20 210:9,12,20 <b>asian</b> 190:17 <b>aside</b> 160:19 <b>asked</b> 16:24 17:13 34:4 58:8 97:12 122:23 123:13 123:15,19,22 126:2 167:23 268:25 292:4 292:10	<b>asking</b> 56:19 69:20 82:14 141:3 145:9 179:9 196:19 208:7 213:5 245:2 255:7 275:7 280:11 <b>aspect</b> 196:3 234:17 247:23 <b>aspects</b> 249:7 <b>aspen</b> 152:11 <b>aspirations</b> 161:23 <b>asq</b> 164:21 168:15 197:14 225:21 <b>assault</b> 1:7 252:22 <b>assemble</b> 239:16 <b>assert</b> 164:13 <b>assess</b> 246:8 <b>assignments</b> 256:8 <b>assistant</b> 96:7 209:14,18 <b>associate</b> 98:4 <b>associated</b> 50:19 <b>assume</b> 16:23 20:17 51:19 53:2 65:20 92:4 267:17
---	---	---	---

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[assuming - basically]

Page 7

<b>assuming</b> 12:8 78:22	<b>australian</b> 190:17	114:4 136:24 138:20	246:11 252:7 252:15 256:3
<b>assumption</b> 51:10	<b>author</b> 13:9 157:11 194:8	<b>aware</b> 128:14 128:19 152:23	272:9,12 273:4 274:24 291:18
<b>assumptions</b> 104:23	<b>authored</b> 32:9 32:10	153:5 269:10 269:13,14,15	<b>background</b> 110:19 212:13 286:24
<b>asymmetry</b> 279:4	<b>authors</b> 13:8 145:3 157:10	<b>awkward</b> 240:8	<b>backing</b> 119:8
<b>atlantic</b> 1:21	157:21,21	<b>b</b>	<b>backs</b> 77:5
<b>atomize</b> 261:4 261:7	194:9	<b>b</b> 3:9 39:17,25 107:21 145:25	<b>bad</b> 81:3 246:13,14,22
<b>attached</b> 28:14 28:25 296:13 298:9	<b>automatically</b> 252:24	146:3 171:12 283:9 289:11	247:5,8 265:23 269:3 278:19
<b>attachment</b> 39:25	<b>automize</b> 260:23 261:4	<b>back</b> 11:6,10 29:7 31:14	<b>balance</b> 278:7 278:13
<b>attachments</b> 39:9	<b>autonomy</b> 113:18,20	41:12 49:17 52:12,25 55:13	<b>band</b> 250:23
<b>attacked</b> 81:14	174:21 270:11	58:8 81:21 84:8,12 85:13	<b>bank</b> 150:21
<b>attempted</b> 68:12 226:13	270:15,19,23 271:2,9,12,12	87:21 94:10 117:19,22	<b>barber</b> 133:16
<b>attention</b> 292:6	271:15,20 272:2,19	124:8 139:11 146:22 149:7	<b>barrier</b> 71:21 171:15
<b>attorney</b> 94:14 296:15	277:20 278:9	149:11 158:14 158:19,25	<b>base</b> 258:8
<b>attorneys</b> 7:3 7:15	<b>available</b> 11:19 32:19 39:11	168:7,23 169:8 170:17 171:7	<b>based</b> 51:11 65:13 78:5
<b>audio</b> 41:14 50:19 268:17	<b>ave</b> 2:10	172:17 176:13 194:2 196:14	81:5 96:25 144:14 150:22
<b>august</b> 19:9 20:5,17,22 21:19 23:22 24:2,14 25:7 211:5,10	<b>average</b> 135:17 <b>averaged</b> 225:9 <b>avoid</b> 270:8 <b>award</b> 105:18 <b>awarded</b> 102:9 102:15 <b>awards</b> 100:7 101:2,8,19,23 102:6 103:9	196:23 199:3 202:5 204:6 218:2,7,9 230:13 233:3 234:11 239:2	167:6 197:11 198:21 202:21 203:12 251:14 255:7 285:7 <b>basic</b> 72:21 218:17 <b>basically</b> 89:5 210:20 212:19 216:5 255:25

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[basis - boss]

Page 8

<b>basis</b> 38:25 41:22 234:16 <b>bathroom</b> 239:17 <b>beau</b> 1:17 8:17 295:6,18 <b>beg</b> 15:23 <b>beginning</b> 1:16 67:2 111:15 134:7 <b>begins</b> 84:10 158:17 218:4 <b>behalf</b> 9:8 86:6 <b>behave</b> 66:18 67:17 <b>behavior</b> 67:19 101:16 111:14 176:8 265:6 278:4 <b>behaviors</b> 66:20 224:20 268:5 274:3 <b>belabor</b> 157:6 <b>belief</b> 148:9 <b>believe</b> 12:12 37:24 39:19 40:11 62:20 66:6 72:15 74:19 87:17 113:3 145:8 146:22 147:21 150:13 168:14 168:22 172:14 174:14,14,25	175:5 183:14 197:23 222:5 224:13 229:16 237:22 239:9 241:11 249:9 251:11 <b>believes</b> 75:13 <b>bellwether</b> 281:20 <b>bellwethers</b> 90:5 <b>ben</b> 2:18 8:14 <b>benefit</b> 30:3 72:16 74:19,23 75:14 249:10 <b>benefits</b> 70:11 70:17,23 73:13 76:24 77:22 171:8,11,12 174:7 249:8,13 249:15 <b>benefitting</b> 248:20 <b>berkman</b> 98:5 98:10 <b>berkover</b> 2:4 9:4 <b>best</b> 16:9 17:6 75:14 101:2,7 109:19 124:17 131:10 151:3 207:10,10 232:15,17,17 237:18 242:15	263:11 <b>better</b> 74:13 121:22 256:20 266:2 285:17 <b>beyond</b> 138:18 197:22 <b>bias</b> 190:22 191:5,14,17,21 192:3,17 273:5 <b>biased</b> 65:25 66:6,12 273:3 <b>biases</b> 191:7 193:2 241:20 <b>biddle</b> 188:12 <b>big</b> 10:15 13:23 152:11 180:24 197:16 233:24 235:8,17 237:4 279:17 <b>biggest</b> 74:19 74:23 <b>billed</b> 21:16 <b>billing</b> 35:19 36:13 <b>bills</b> 35:19 <b>binary</b> 69:15 175:23,24 176:3 <b>biometrics</b> 245:17 <b>birthday</b> 294:5 294:7 <b>bit</b> 71:19 72:10 72:13 80:12	114:23 145:21 163:4 165:11 166:16 196:18 199:12 208:3 210:22 245:22 250:8 253:16 253:22 276:11 287:4 <b>black</b> 150:23 242:22 243:3 <b>blitz</b> 4:7 <b>block</b> 82:8 <b>blocked</b> 78:5 78:22 79:24 80:6 81:17 <b>board</b> 42:6 43:6,8 44:6 46:14,17,25 47:12 49:19 50:13 105:19 281:17 <b>boards</b> 127:24 <b>bodies</b> 243:3 <b>body</b> 39:16 208:17 <b>boilerplate</b> 260:9 <b>book</b> 105:12 150:24 151:3 <b>books</b> 174:2 <b>boss</b> 173:7 174:9,13,15 175:2,6 271:2
---	--	---	---

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[bottom - cameron]

Page 9

<b>bottom</b> 46:12 60:11 143:16 206:2 207:11 <b>bouncing</b> 31:14 <b>bound</b> 149:4 <b>boundary</b> 289:14 <b>bowling</b> 173:25 <b>box</b> 52:3 <b>boxes</b> 214:25 <b>braking</b> 225:4 246:4 <b>branch</b> 183:23 <b>branches</b> 183:25 <b>brazil</b> 214:2 <b>break</b> 17:11,14 54:15 83:23 156:4 158:6 173:22 212:9 217:13 <b>breakdown</b> 21:15 <b>breakdowns</b> 279:14 <b>breaking</b> 100:6 <b>breaks</b> 17:11 17:16 132:6 <b>breathed</b> 293:7 <b>brief</b> 83:23 <b>briefly</b> 55:17 225:22 <b>briefs</b> 99:8	<b>bringing</b> 127:17 226:9 229:4 <b>brings</b> 149:15 260:9 <b>british</b> 13:22 <b>broad</b> 48:9 50:7 135:23 273:11 275:5 <b>broader</b> 76:6 199:8 242:4,10 293:17 <b>broccoli</b> 271:18 <b>broken</b> 80:8 <b>brought</b> 85:25 204:10 <b>brown</b> 242:22 243:3 <b>brussel</b> 271:19 <b>buckets</b> 206:3 <b>build</b> 132:9 <b>building</b> 127:18 <b>built</b> 276:23 <b>bulk</b> 281:22,22 <b>bunch</b> 51:24 138:19 <b>burawoy</b> 137:17 <b>burroway</b> 276:19 <b>busier</b> 21:22 22:2,2	<b>business</b> 109:18 117:2 237:16 267:9 <b>businesses</b> 71:10 <b>buy</b> 221:9 <b>c</b> <b>c</b> 2:2 35:11 78:3 85:15 145:25 268:4 295:2,2 <b>cage</b> 244:5,14 244:22 245:4 <b>calarco</b> 105:14 <b>calculated</b> 225:10 <b>calculations</b> 52:22 <b>california</b> 1:3 8:12 209:10,12 <b>call</b> 78:16 120:11 221:10 244:4,13 267:2 <b>called</b> 30:23 39:18 54:22 63:7 70:4 97:6 105:14 108:2 121:2 151:19 184:3,23 188:3 215:17 227:3 228:20 259:21 260:9 270:21 <b>calls</b> 62:11 107:2 118:19	122:22 154:21 266:12 <b>cameras</b> 245:16 268:17 <b>cameron</b> 1:1,13 2:1 3:1,5,13,20 4:1,4,7,13,22 5:1 6:1 7:1 8:1 8:9 9:1,11,22 9:24 10:1 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1,24 25:1 26:1,3 27:1 28:1 29:1 30:1 31:1,2 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1 56:1 57:1 58:1 59:1 60:1 61:1 62:1 63:1 64:1 65:1 66:1 67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1 75:1 76:1 77:1 78:1 79:1 80:1
--	--	---	---

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

**[cameron - carefully]**

Page 10

81:1 82:1 83:1	154:1 155:1	222:1 223:1	288:1,4 289:1
84:1,13 85:1	156:1 157:1	224:1 225:1	289:13 290:1
86:1 87:1 88:1	158:1,19 159:1	226:1 227:1	290:13 291:1,5
89:1 90:1 91:1	160:1 161:1	228:1 229:1	291:25 292:1
92:1 93:1 94:1	162:1 163:1	230:1 231:1	293:1 294:1,18
95:1 96:1 97:1	164:1 165:1	232:1 233:1	295:1,7 296:1
98:1 99:1	166:1 167:1	234:1 235:1	297:1 298:1
100:1 101:1	168:1 169:1	236:1 237:1	<b>cameroninvo...</b>
102:1 103:1	170:1 171:1	238:1 239:1	3:15
104:1 105:1	172:1 173:1	240:1 241:1	<b>cameroninvo...</b>
106:1 107:1	174:1 175:1	242:1 243:1	4:11
108:1 109:1	176:1 177:1	244:1 245:1	<b>cams</b> 268:20
110:1 111:1	178:1 179:1	246:1 247:1	269:4,13,18
112:1 113:1	180:1 181:1	248:1 249:1	<b>capabilities</b>
114:1 115:1	182:1 183:1	250:1,12,22	161:21
116:1 117:1	184:1 185:1	251:1 252:1	<b>capital</b> 4:21
118:1 119:1	186:1 187:1	253:1 254:1	79:4 173:20
120:1 121:1	188:1 189:1	255:1 256:1	<b>cappelli</b> 237:13
122:1 123:1	190:1 191:1	257:1 258:1	<b>capture</b> 228:16
124:1 125:1	192:1 193:1	259:1 260:1	<b>car</b> 34:10 78:7
126:1 127:1	194:1 195:1	261:1 262:1	79:18 80:8,9
128:1 129:1	196:1 197:1	263:1 264:1,10	80:18 151:9
130:1 131:1	198:1 199:1	265:1,18 266:1	204:25 205:3
132:1 133:1	200:1 201:1	267:1 268:1	210:18 221:11
134:1 135:1	202:1 203:1,25	269:1 270:1	238:18,19
136:1 137:1	204:1 205:1,25	271:1 272:1	268:21
138:1 139:1	206:1 207:1,12	273:1 274:1	<b>card</b> 276:6
140:1 141:1	208:1 209:1	275:1 276:1	<b>cards</b> 71:3
142:1 143:1	210:1 211:1	277:1 278:1	<b>care</b> 72:7
144:1 145:1	212:1 213:1	279:1 280:1	171:24
146:1 147:1	214:1 215:1	281:1 282:1	<b>career</b> 109:12
148:1 149:1	216:1 217:1	283:1 284:1	<b>careful</b> 95:10
150:1 151:1	218:1,7 219:1	285:1 286:1	<b>carefully</b>
152:1 153:1	220:1 221:1	287:1,17,17	214:15 296:5

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[cares - choosing]

Page 11

<b>cares</b> 135:17,18	<b>cases</b> 8:10 35:3	<b>certification</b>	<b>characterizati...</b>
<b>cargo</b> 288:10	55:9,21 56:3,4	216:21	45:7
<b>carolina</b> 209:6	56:6 85:20,24	<b>certify</b> 295:7	<b>characterize</b>
<b>carrots</b> 274:21	86:7,11 87:15	298:4	132:16
274:22	87:18 88:6,12	<b>cetera</b> 149:3	<b>charged</b> 224:16
<b>cars</b> 210:16	88:21 89:12,17	<b>challenge</b>	224:18 259:23
<b>case</b> 1:6 19:13	89:24 90:15	181:23	<b>charmaz</b>
21:6 23:16,19	93:11 128:21	<b>challenges</b>	188:11
25:10 34:18	227:19,23	77:23 78:2	<b>check</b> 26:10
37:16 52:11	228:2 250:16	135:22 171:9	225:21
53:10 54:19	281:20	<b>chan</b> 67:23	<b>checking</b> 26:13
55:24 88:7	<b>cash</b> 210:17,18	138:24	71:2
89:8,18 90:9	<b>cast</b> 108:4	<b>chance</b> 40:6	<b>checks</b> 116:23
90:19,19 92:5	<b>catch</b> 85:8	227:21 260:11	<b>cherry</b> 132:13
92:21,24,25	<b>categories</b>	<b>change</b> 12:20	<b>chicago</b> 259:6,6
93:4,14 94:11	214:16 215:25	28:14 109:12	259:8
94:12,19,22,25	289:2	145:19 155:19	<b>child</b> 72:7
95:3,5,21,23	<b>category</b> 53:3	179:13 192:14	171:24 271:18
97:2 159:5,9	216:7 251:7	192:15 196:5	<b>chinyere</b> 2:16
162:7 198:23	289:4	197:7 203:11	<b>choice</b> 151:12
213:4,6,17	<b>causes</b> 79:23	260:10 297:5,8	160:20 164:25
214:4,9 217:6	<b>caveat</b> 82:6	297:11,14,16	165:21,24
225:16 226:14	170:14	297:19,22	166:5,22,24
227:17 238:23	<b>celebrate</b>	<b>changed</b> 90:25	167:17 168:3
252:21 253:11	230:15	113:10 155:14	170:19 172:20
262:8 265:16	<b>center</b> 98:5	192:10 196:25	256:23 257:3
269:16,17	<b>centered</b> 184:6	197:3,9,15	270:22 271:20
279:15 284:15	199:6	206:22 260:13	277:19,23
285:3,11,14,15	<b>certain</b> 21:21	288:22	<b>choices</b> 165:8
285:17,18,22	47:14 118:4	<b>changes</b> 15:21	170:22
285:25 287:2	119:9 237:22	244:8 249:19	<b>choose</b> 271:21
289:18 290:7	242:19 256:18	296:12 298:8	<b>choosing</b>
292:13,18	278:4	<b>changing</b>	166:22 168:3
293:20,23		206:15	277:13

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[chops - coming]

Page 12

<b>chops</b> 126:12	<b>citing</b> 77:6	<b>clear</b> 51:23	<b>collect</b> 43:19
<b>chose</b> 160:18	127:16 188:11	63:24 87:3	192:20 193:4
<b>chosen</b> 198:3	285:22 287:10	113:13 134:22	194:19 204:5
<b>christian</b>	287:22,23	135:2 157:16	204:10 213:20
226:18	<b>city</b> 76:19	167:14 279:3	265:5
<b>chunk</b> 207:13	98:24 222:18	<b>clients</b> 71:10	<b>collected</b> 197:4
<b>cia</b> 93:15	237:24 260:23	218:19	197:20 204:2
<b>circumstances</b>	261:8	<b>close</b> 57:21	209:19 255:8
194:23	<b>claim</b> 153:16	77:20 156:7	<b>collecting</b>
<b>citation</b> 13:14	<b>claims</b> 68:22	162:14	44:20 133:10
14:9,13 15:9	81:23 120:21	<b>closed</b> 262:13	134:10 204:13
77:13	127:12 135:25	263:15	206:16 272:11
<b>citations</b> 12:19	136:12 137:3	<b>closely</b> 263:22	<b>college</b> 174:2
12:23 14:10	137:20,23	<b>closer</b> 188:13	<b>colleges</b> 76:17
39:16 51:12	199:8 219:25	<b>cluttered</b> 229:7	<b>colloquial</b>
100:8 101:20	<b>clarification</b>	<b>coach</b> 265:25	160:3
101:25 102:4	30:8	<b>coaching</b>	<b>column</b> 174:5
284:19,23	<b>clarified</b> 217:8	187:15,18	<b>come</b> 29:7,14
287:2	<b>clarify</b> 14:12	<b>coauthor</b>	58:4,8 117:19
<b>cite</b> 15:18	<b>clarifying</b>	142:17 216:24	128:20,23
105:13 139:8	50:25	<b>coauthors</b>	129:17 137:15
183:12 188:10	<b>class</b> 97:7,10	244:22	174:19 179:22
203:25 214:9	110:2 135:8	<b>code</b> 223:18,24	180:14,16
250:10 290:15	138:9 226:9	224:2,4,7	211:20 247:16
<b>cited</b> 13:12	<b>classes</b> 96:14	240:20 241:19	265:22 284:15
15:3 33:23,24	96:24 97:20,22	<b>coding</b> 214:16	288:14,23
34:18 39:9,25	111:2	214:21 215:10	<b>comes</b> 116:12
79:22 100:5	<b>classification</b>	215:17,20	135:25 197:24
126:19 185:9	61:21 87:22	216:5 272:13	215:4 258:9
287:20	88:2 115:5,24	289:3	274:11
<b>cites</b> 289:17	<b>classified</b>	<b>coercion</b> 260:6	<b>comfortable</b>
<b>cities</b> 192:23,24	115:20 233:12	<b>coercive</b> 260:15	201:22 219:2
237:22 238:6,7	233:16 237:8	<b>colleague</b> 58:6	<b>coming</b> 72:11
			107:24 184:10



## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[coming - conclusion]

Page 13

226:2 243:6 267:21 <b>comment</b> 83:15 105:2 <b>comments</b> 225:24 <b>commission</b> 298:19 <b>committee</b> 47:13 57:7 59:2 60:13 77:18 <b>common</b> 44:7 149:24 159:13 159:15 160:11 160:14,14 179:16 208:2 258:22 259:14 <b>commonly</b> 190:9 192:12 <b>commonwealth</b> 1:18 295:3 <b>communicate</b> 256:9 <b>communities</b> 143:22 262:16 262:25 <b>community</b> 70:6 110:17 <b>companies</b> 71:23 76:13 79:6 86:13 91:21,22 92:5 92:15,20 94:13	115:4,6,14 116:3,24 117:4 117:5 171:17 212:3 218:17 231:14 249:25 260:22 266:15 270:2 <b>company</b> 65:17 76:18 78:16 94:17 151:12 152:5,6 179:19 195:18 219:2 220:2,12,18,21 226:21 241:12 259:14 286:20 <b>comparatively</b> 263:19 <b>compare</b> 200:21 259:9 <b>compared</b> 82:10 100:8,15 <b>compares</b> 117:10 <b>comparing</b> 76:2,3,3 118:14 200:10 264:12 <b>comparison</b> 115:15 141:2 263:9 <b>compete</b> 256:8 <b>competition</b> 273:22	<b>compiled</b> 52:16 <b>complaint</b> 250:3,4,25 <b>complaints</b> 78:6,14 79:12 79:23 81:5 251:14 <b>complete</b> 35:13 43:22 45:18 55:20 83:10 107:3 125:15 135:7 238:17 <b>completed</b> 262:14 <b>completely</b> 229:21 <b>completing</b> 91:19 <b>complex</b> 72:19 72:25 261:15 <b>compliance</b> 65:16 <b>complicated</b> 277:2 <b>components</b> 202:17 243:22 283:16 <b>compositions</b> 139:23 <b>computer</b> 18:10 108:20 110:20 224:4,7 264:18 295:11	<b>con</b> 221:20 <b>concept</b> 108:2 140:8 146:16 147:13 159:4,9 160:23 166:5 175:23 200:5 229:15 234:20 260:8,21 279:10 280:12 <b>concepts</b> 130:7 233:24 <b>conceptual</b> 211:16 <b>conceptualiz...</b> 69:13 <b>conceptually</b> 239:3 274:23 <b>concern</b> 226:25 252:6 <b>concerned</b> 81:19 258:5 <b>concerning</b> 37:2 50:17 51:5 <b>concerns</b> 81:24 <b>concierge</b> 2:17 <b>concluded</b> 294:21 <b>concluding</b> 163:8 <b>conclusion</b> 62:11 107:2 118:19 122:22 137:16 143:12
--	---	---	---



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[conclusion - control]

Page 14

154:21 <b>conclusions</b> 14:6 81:18 124:12 129:10 179:8,23 180:15 181:10 201:11,23 202:21 213:22 <b>condense</b> 212:17 <b>conditions</b> 268:11,11 289:14 <b>conduct</b> 126:16 <b>conducted</b> 41:17 207:19 210:4 213:5 <b>conference</b> 34:7 <b>conferences</b> 99:11 <b>confident</b> 270:21 286:4 <b>confidentiality</b> 43:17 48:2,5 56:25 57:2 95:12 <b>confine</b> 270:21 <b>confirm</b> 204:11 <b>confirms</b> 279:15 <b>confused</b> 202:9 <b>connect</b> 218:18 248:10,21	<b>connected</b> 35:20 77:18 <b>connection</b> 51:17 269:11 <b>connections</b> 215:19 <b>connects</b> 219:8 <b>connotation</b> 64:16 <b>conroy</b> 2:3 9:3 <b>consent</b> 7:13 130:15,16 164:22 <b>consenting</b> 260:7 <b>consequences</b> 70:5 <b>consider</b> 104:18 191:11 235:25 238:21 <b>considered</b> 39:7,18 40:9 40:24 41:4 51:20 126:19 138:17 <b>considering</b> 199:7 <b>consist</b> 22:6 205:24 <b>constantly</b> 24:9 <b>constraints</b> 73:5 172:15 270:12	<b>construct</b> 189:20,22 190:13 <b>constructed</b> 149:6 <b>constructing</b> 189:14 <b>construction</b> 148:17 178:9 187:2 189:9 240:13,14,24 <b>constructs</b> 104:24 <b>consulting</b> 36:25 56:13,15 56:21 <b>consume</b> 126:17 <b>consumer</b> 284:10 <b>contact</b> 75:25 <b>contained</b> 12:17 53:20 <b>content</b> 184:9 289:3 <b>contested</b> 220:5 <b>context</b> 76:2 140:5 171:5 187:24 190:15 210:13 220:8 234:6 <b>contexts</b> 139:22 145:16 146:9 267:7	<b>contingent</b> 185:20 <b>continue</b> 70:16 77:9 111:23 112:15,18,21 143:20 211:21 287:14 <b>continued</b> 23:22 <b>continuing</b> 149:8 260:21 <b>contract</b> 37:15 <b>contractor</b> 61:2 61:15 <b>contractors</b> 61:9,24 115:7 115:19,21 233:10,13,16 237:9 <b>contracts</b> 36:25 37:13 <b>contradiction</b> 172:5 <b>contrast</b> 115:15 <b>contribute</b> 174:5 245:11 <b>contributing</b> 186:25 <b>contribution</b> 102:23 103:24 <b>control</b> 41:23 44:17 62:23 63:7,13,16,25 64:4,14,20
--	---	--	---

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[control - correct]

Page 15

66:16,19 67:3	236:23,25	<b>conversational</b>	149:19 150:2,3
67:7,11,18	237:3,7 238:22	207:19,21,25	150:6 152:25
68:2,13,23	239:4,14,15	208:4,8,12,15	155:11 157:7
69:13,14,21	243:24 244:4,7	212:24	157:17 159:18
88:3,13,22	244:13 245:12	<b>conversations</b>	159:24 160:13
89:12,14 95:7	246:22 247:10	42:13 159:11	161:23,24
113:18,20	248:13,17	205:13 214:18	163:2,17,18
128:22 129:8	249:4 256:5	216:16 272:17	164:3,4,7
129:13,21	258:11,14	<b>copy</b> 11:22	165:15 169:17
135:15 137:13	259:13,19	27:17 34:4	169:20 170:3
138:25 148:21	264:4,5 266:13	51:25 91:10	171:24,25
159:4,9,12,15	267:5,12	214:24	172:12 175:24
160:3,10,12,17	268:16 269:6,9	<b>core</b> 102:19	176:20 177:7,8
161:5,14,20	270:4 271:7,16	286:2 289:22	181:14 183:9
162:6,6 163:11	271:23 273:20	<b>corporate</b>	183:10 185:25
163:13,17,21	274:11,16,19	13:24	187:5 194:25
163:23 164:6,9	274:20,24	<b>correct</b> 10:4	198:24 199:11
164:12 165:13	275:17,19	18:2 20:18,19	201:8 205:15
165:14,16,19	276:10 277:12	21:12 23:23,24	206:13 208:24
166:9 167:12	277:21 278:8	25:4 36:8 46:9	208:25 209:16
169:9,12	278:21,22	46:10 50:10	209:17 210:11
170:24 172:23	279:2,21,25	55:23 59:2	212:15,19
173:4 175:18	280:2,13	61:6,9 63:15	213:2,11
175:22 176:10	282:24 283:10	66:23 71:5	214:18,19
191:21 197:17	<b>controlled</b>	77:23 85:22	218:22 220:24
219:18,24	136:15 192:17	86:2 88:9	222:14,20
221:6 231:20	235:9 274:5,9	90:12 91:24	233:7 237:21
232:6 233:3,8	<b>controlling</b>	93:15 96:10,11	238:3 239:6,19
233:17,20	266:16 275:10	96:16 99:2	241:4 242:9
234:17,20	<b>conversation</b>	105:11 108:23	244:10,11
235:2,4,5,9,10	52:13 137:10	111:7 118:7	245:24 246:3,7
235:11,14,15	200:13 273:4	121:5,6,10	246:10 248:14
235:22 236:3	277:17	124:20,21	248:22 249:8
236:13,17,21		128:16 131:20	249:23 250:5,9

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[correct - customers]

Page 16

251:10 256:18 260:25 261:2,9 261:10,12 262:19 263:2,3 264:5,6 265:6 265:7 268:8 274:7 283:8,12 283:17,18,22 284:3 285:23 285:24 286:14 298:5 <b>corrections</b> 296:5,7 298:8 <b>correctly</b> 51:14 91:16 115:11 295:10 <b>cory</b> 228:23 <b>counsel</b> 7:12,19 8:9,18,23 17:24 21:6 35:5 40:22 56:18 84:18 292:4 295:12 <b>counter</b> 110:9 <b>counts</b> 148:11 <b>county</b> 295:4,6 <b>couple</b> 31:10 39:22 92:3 133:21 245:15 250:12 286:11 292:2 <b>course</b> 17:3 76:16 96:13,20 97:5,6 225:7	263:16 <b>courses</b> 96:18 98:13 124:18 126:4 <b>court</b> 1:2 2:5 7:5 8:11,16 16:10,18 35:5 35:7 106:24 128:16 129:10 201:15 294:10 296:19 <b>courtesy</b> 97:15 97:20 <b>courts</b> 106:16 <b>cousin</b> 151:10 <b>cover</b> 55:24 96:17,20 131:12 207:13 <b>covered</b> 77:22 83:9 288:2 290:19 <b>covers</b> 79:6 <b>covid</b> 65:21 <b>craft</b> 126:9,10 <b>crafting</b> 106:22 <b>crb</b> 1:7 <b>cream</b> 230:15 <b>create</b> 102:20 103:19 181:13 181:20 191:8 220:2 248:9 293:15 <b>created</b> 43:14 145:20 275:9	<b>creates</b> 104:4 276:9 <b>creating</b> 103:17 189:3 190:2,2 214:16 215:9 215:24 220:4 248:21 271:8 <b>creation</b> 182:15 <b>credit</b> 71:3 73:12 <b>creek</b> 260:10 <b>criteria</b> 244:7,9 <b>critical</b> 125:11 152:3 153:6,7 154:3 184:6 <b>criticized</b> 13:15 13:17 15:2 <b>critique</b> 13:10 13:19 154:25 <b>critiques</b> 127:11 <b>crucial</b> 194:19 231:11 <b>crystallization</b> 280:20 <b>cs7737764</b> 1:25 <b>cultural</b> 4:21 74:8 139:22 216:22 236:19 236:20,21 242:5,10 270:24 <b>culture</b> 110:23	<b>cultures</b> 110:23 <b>curated</b> 240:22 <b>current</b> 15:20 26:24 27:3,19 31:19 108:18 109:2 211:13 212:13 <b>currently</b> 15:24 96:7 <b>curriculum</b> 26:25 <b>customer</b> 78:6 78:7,14 79:12 79:23 80:14 81:12,13,14 198:3 225:7 250:3,24 253:18 261:23 264:5 265:8,13 265:21 266:4 267:8 276:4 290:14 <b>customers</b> 70:5 70:12,18 80:12 80:12 122:3 218:19 221:22 224:16,18 225:8 228:15 251:18 256:9 265:4 266:11 266:17,18,25 267:4,13 268:6 282:25
--	---	---	--

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[cut - degrade]

Page 17

<b>cut</b> 168:16	181:9 184:9,10	298:16	186:14
<b>cv</b> 3:23 27:2,17	190:19 192:20	<b>days</b> 30:4	<b>deemed</b> 252:23
27:19 28:12,14	192:22 193:5	296:16	296:18
28:23 29:17	194:19 195:17	<b>dc</b> 2:10	<b>deep</b> 62:21 88:7
31:20 111:5	197:5,19,25	<b>deactivated</b>	201:3
<b>cycle</b> 218:13	204:2,4,5,10,13	78:4 81:4	<b>deeply</b> 15:16
<b>d</b>	206:16 208:9	254:8,21 255:4	258:6
<b>d</b> 3:2 24:24	208:20 209:20	255:9 266:9	<b>defendant</b>
107:21	210:3,9 211:17	<b>deactivation</b>	86:20 94:15
<b>d.c.</b> 41:21	213:21,21,25	251:18 253:23	<b>defendant's</b>
131:25	214:4 215:4,11	254:6,10	30:25 39:5,12
<b>dance</b> 278:7,12	216:6 226:21	290:17	<b>defendants</b>
278:14	226:23 227:3	<b>deal</b> 64:8	3:18 9:9
<b>darker</b> 66:10	240:22 254:22	<b>decay</b> 216:22	<b>define</b> 87:8
<b>dash</b> 268:20	255:8,17,18	228:20 230:20	161:7,13 162:5
269:3,13,18	259:11 265:5	231:2,7,8,24	164:23 166:17
<b>data</b> 13:23 14:2	272:11 273:2	232:6	<b>defined</b> 129:8
14:6,18,25	281:19 285:16	<b>deceleration</b>	129:14 159:5
15:2 43:21,23	285:17 286:2,7	225:4	161:20
44:2,21 45:3	288:10 289:3	<b>decide</b> 52:9	<b>defining</b> 125:9
45:15,23 48:9	289:18 290:7	75:12 203:17	127:17
48:15 70:23	292:25	<b>decided</b> 109:12	<b>definite</b> 278:13
78:20 98:23	<b>dataset</b> 148:18	200:13	<b>definitely</b> 241:7
106:5 108:14	180:3,19	<b>decision</b> 78:9	248:17 249:16
120:20 132:9	<b>datasets</b> 210:7	223:20,25	284:13
133:10,12,19	<b>date</b> 26:25 27:3	240:25	<b>definition</b>
134:10,12,12	29:17 31:19	<b>deck</b> 147:2	69:21 161:4,25
137:21 147:11	32:12 296:10	<b>declarations</b>	162:2,6 169:9
147:11,18	298:12	38:11	178:18 188:15
148:11 149:2	<b>dated</b> 19:8	<b>decline</b> 229:25	233:6
177:18,21,21	33:14 85:6	<b>declining</b>	<b>definitions</b> 62:8
179:14,19	<b>day</b> 28:24	167:22	238:22
180:4,7,18	112:22 127:23	<b>deductive</b>	<b>degrade</b> 228:19
	273:7 295:15	185:22 186:7	230:17

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[degrades - develop]

Page 18

<b>degrades</b> 229:8	<b>departure</b>	295:7,11 296:4	280:23
<b>degree</b> 110:10	185:22 186:7	296:13,17,18	<b>descriptions</b>
124:16 125:18	<b>depend</b> 123:2	<b>depositions</b>	176:16,17
129:2	<b>depended</b>	40:5,16 51:24	<b>descriptive</b>
<b>degrees</b> 108:20	257:21	52:4 227:12,13	65:3
<b>deidentified</b>	<b>dependence</b>	227:18	<b>design</b> 96:21,23
44:15,18 45:12	257:8	<b>depth</b> 41:16	193:24 196:4
45:14 48:5,14	<b>dependent</b>	99:24 144:11	<b>designed</b>
48:16,19	258:13,16	152:15 177:5	232:10 240:15
<b>deidentify</b>	262:14 280:8	265:19 292:20	274:12 276:8
45:11	<b>depending</b>	<b>derivation</b>	276:13,17,21
<b>deidentifying</b>	120:2 138:15	185:21	<b>designers</b>
48:9	165:25 179:20	<b>derived</b> 275:15	193:20,25
<b>delete</b> 43:20	275:23 277:3	<b>describe</b> 87:14	<b>designs</b> 221:5
<b>deleted</b> 122:17	<b>depends</b> 123:21	91:18 123:14	<b>destination</b>
<b>delivery</b> 97:11	131:15 164:18	134:4 150:5	198:4
<b>demand</b> 159:17	166:14,16	165:15 176:5	<b>detail</b> 36:14
159:23 218:12	193:9 201:12	192:7,12	122:10 239:14
218:17,25	201:17	212:13 278:6	<b>detailed</b> 239:5
220:21 244:5	<b>depicting</b> 190:2	<b>described</b>	239:8,15
246:23 256:7	<b>deponent</b> 295:8	49:17 62:8	283:10
256:12 258:19	295:10 298:2	79:7 121:2	<b>details</b> 49:7
264:3 265:2,9	<b>deposed</b> 16:3	182:8 213:16	56:19 197:15
265:12,17	56:8	216:2 229:15	251:5
266:15 267:14	<b>deposing</b>	292:19	<b>detecting</b> 66:10
268:5,10,14	296:15	<b>describes</b>	<b>determine</b>
270:2 283:6	<b>deposition</b> 1:12	151:11 206:2	45:25 59:20
<b>democratic</b>	3:19 6:2 7:4,6	207:23 240:13	200:17 268:15
57:6	7:7 8:8 18:14	<b>describing</b> 96:5	<b>determines</b>
<b>denials</b> 168:7	20:10 25:14	145:9 165:13	224:9
<b>denise</b> 9:22	26:2 27:16	191:9	<b>devalue</b> 243:3
<b>department</b>	31:2 35:7,12	<b>description</b>	<b>develop</b> 52:11
97:24 98:2	40:3 85:17	3:11 4:2 5:2	103:20 153:11
	95:16 294:21	6:9 245:4	180:18 199:8

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[developing - distinction]

Page 19

<b>developing</b> 105:14 144:2	136:11 137:9 138:14 139:22	<b>dillahunt</b> 4:22	42:5 46:13,18
<b>development</b> 103:13 173:21	140:9 141:24 145:21 148:5	<b>dillard</b> 1:17 8:17 295:6,18	<b>discourse</b> 143:22 174:20
<b>deviant</b> 164:24	148:23 154:2	<b>dimensions</b> 64:6 105:16	<b>discrimination</b> 242:18
<b>deviating</b> 261:18	164:9,17 165:6 165:9,22,25	239:4	<b>discuss</b> 56:24 119:23 217:5
<b>diagrams</b> 52:23	169:18 174:24	<b>dinner</b> 271:19	265:19 283:15
<b>diamond</b> 198:12	176:7 178:24 179:7,18,19,21	<b>direct</b> 64:7 153:10 176:7	<b>discussed</b> 35:24 36:7 84:18
<b>diaries</b> 41:15	179:23 180:6	<b>directed</b> 262:3	141:11 149:14
<b>dies</b> 76:14	180:17 181:3,5	<b>direction</b> 6:4 50:17 278:4	159:20 227:14 283:24
<b>difference</b> 28:22 62:18,21 117:6 207:24 264:17	181:9 184:7 186:13 189:24 195:17 198:17 206:2,6 207:22	<b>directly</b> 120:10 121:8 215:4 266:4	<b>discussing</b> 50:9 89:7 99:14 185:18
<b>differences</b> 62:7,22 63:3 200:17,22	208:16 210:17 216:3 232:11 234:23 235:3	<b>disagree</b> 167:3 172:2 174:12 179:10 276:19 282:12	<b>discussion</b> 130:16 194:15
<b>different</b> 14:4,4 14:6,17,18,20 14:21 34:10 36:14 44:19 49:2 57:20 60:16 61:19 62:24 69:12 76:2,8 86:25 89:6 105:16,24 108:13 113:22 114:4,5 116:25 127:11,20 129:9,15 133:13,20 135:4,9 136:2	235:11 236:8 262:10 267:11 270:18 276:11 280:10 283:16 <b>differently</b> 82:8 129:9,14 179:18 219:6 220:6 248:19 <b>differs</b> 203:12 <b>difficult</b> 196:3 254:5 <b>digital</b> 134:12 134:12 220:14 220:23	<b>disagreeing</b> 119:8 <b>disagreement</b> 150:10 167:7 <b>discipline</b> 157:10 <b>disciplines</b> 62:24 99:19 129:9,15 149:5 220:7 <b>disclose</b> 95:10 <b>disclosed</b> 95:13 <b>disclosure</b> 34:19 35:5	<b>disproportion...</b> 101:4 102:6 <b>dispute</b> 119:6 <b>dissertation</b> 4:13 77:18 112:7,12,13 113:10,13,19 113:24 114:6 114:10 139:12 140:2,14,20,23 140:24 141:12 141:18 <b>distinct</b> 267:15 <b>distinction</b> 41:3 178:12

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[distinctions - dr]

Page 20

<b>distinctions</b>	<b>documentation</b>	5:1 6:1 7:1 8:1	102:1 103:1
146:4	47:19	9:1,11,24 10:1	104:1 105:1
<b>distinguish</b>	<b>documents</b> 6:8	11:1 12:1 13:1	106:1 107:1
115:3	22:12,21,25	14:1 15:1 16:1	108:1 109:1
<b>distinguished</b>	23:2,4,6,7,14	17:1 18:1 19:1	110:1 111:1
116:9	31:15,24 32:16	20:1 21:1 22:1	112:1 113:1
<b>distinguishes</b>	38:13,19,24	23:1 24:1 25:1	114:1 115:1
116:3	39:4,6,10,23	26:1,2 27:1	116:1 117:1
<b>district</b> 1:2,3	40:2 41:13	28:1 29:1 30:1	118:1 119:1
8:11,12	49:20 51:16,24	31:1 32:1 33:1	120:1 121:1
<b>division</b> 1:4	53:16 173:2	34:1 35:1 36:1	122:1 123:1
8:13	198:22 214:9	37:1 38:1 39:1	124:1 125:1
<b>doctoral</b>	222:6 224:10	40:1 41:1 42:1	126:1 127:1
124:18 125:18	250:15 253:7	43:1 44:1 45:1	128:1 129:1
126:3 138:9	253:10 262:7	46:1 47:1 48:1	130:1 131:1
<b>doctorow's</b>	284:15,20	49:1 50:1 51:1	132:1 133:1
228:23	285:7,11,18	52:1 53:1 54:1	134:1 135:1
<b>document</b>	286:8 290:5,8	55:1 56:1 57:1	136:1 137:1
11:14 18:20	292:25	58:1 59:1 60:1	138:1 139:1
19:18,19,22	<b>doing</b> 27:7	61:1 62:1 63:1	140:1 141:1
25:17 26:6,14	49:13 109:9	64:1 65:1 66:1	142:1 143:1
26:22 27:10	127:25 135:14	67:1 68:1 69:1	144:1 145:1
30:15 31:3,9	150:17 168:12	70:1 71:1 72:1	146:1 147:1
32:24 33:11	214:5 261:22	73:1 74:1 75:1	148:1 149:1
46:24 47:5	263:20 264:17	76:1 77:1 78:1	150:1 151:1
54:12 59:7	272:12 280:23	79:1 80:1 81:1	152:1 153:1
60:10 77:21	296:9	82:1 83:1 84:1	154:1 155:1
84:22 114:13	<b>doordash</b>	84:13 85:1	156:1 157:1
141:24 142:6	211:19	86:1 87:1 88:1	158:1,19 159:1
156:5,7,13	<b>dots</b> 193:17	89:1 90:1 91:1	160:1 161:1
162:17 184:18	<b>downplay</b>	92:1 93:1 94:1	162:1 163:1
187:20 206:22	220:11,15	95:1 96:1 97:1	164:1 165:1
254:13,23	<b>dr</b> 1:1,13 2:1	98:1 99:1	166:1 167:1
	3:1,5,20 4:1	100:1 101:1	168:1 169:1

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[dr - drivers]

Page 21

170:1 171:1	238:1 239:1	<b>drafting</b> 23:19	192:23 195:24
172:1 173:1	240:1 241:1	214:18	198:2 202:22
174:1 175:1	242:1 243:1	<b>draw</b> 110:18	204:21 207:6
176:1 177:1	244:1 245:1	181:9 201:11	222:4,7 230:9
178:1 179:1	246:1 247:1	213:21 277:4	238:10 250:23
180:1 181:1	248:1 249:1	284:24	251:2 252:14
182:1 183:1	250:1 251:1	<b>drawback</b>	281:5
184:1 185:1	252:1 253:1	70:17	<b>driver's</b> 250:2
186:1 187:1	254:1 255:1	<b>drawbacks</b>	<b>drivers</b> 41:18
188:1 189:1	256:1 257:1	70:11	42:13 44:14,23
190:1 191:1	258:1 259:1	<b>drawing</b>	61:4,8 65:19
192:1 193:1	260:1 261:1	100:24 127:14	70:24 71:8,23
194:1 195:1	262:1 263:1	235:18 243:15	72:4 73:7,13
196:1 197:1	264:1 265:1	243:16	73:14 76:13,24
198:1 199:1	266:1 267:1	<b>drawings</b> 52:22	78:3,5,23
200:1 201:1	268:1 269:1	<b>draws</b> 99:21	79:22 80:17
202:1 203:1	270:1 271:1	177:2	81:20 111:19
204:1 205:1	272:1 273:1	<b>drew</b> 110:21,22	112:19,22,24
206:1 207:1	274:1 275:1	<b>drivable</b> 80:10	113:6,8 115:6
208:1 209:1	276:1 277:1	80:10	115:7,8 117:11
210:1 211:1	278:1 279:1	<b>drive</b> 72:23	118:14 136:14
212:1 213:1	280:1 281:1	222:24 230:14	137:3 160:17
214:1 215:1	282:1 283:1	259:12 278:3	163:10,13,22
216:1 217:1	284:1 285:1	289:13	164:6,12 165:9
218:1,7 219:1	286:1 287:1	<b>driver</b> 33:15	165:14,24
220:1 221:1	288:1 289:1	41:20 68:22,22	166:9 167:16
222:1 223:1	290:1 291:1,25	69:4 74:18,20	170:19 171:17
224:1 225:1	292:1 293:1	74:24 75:12,12	173:7 174:6,13
226:1 227:1	294:1,18 295:1	75:15 78:8,20	174:14 175:18
228:1 229:1	295:7 296:1	79:18 80:3,15	179:17 201:23
230:1 231:1	297:1 298:1	81:13,14 91:18	204:25 205:19
232:1 233:1	<b>draft</b> 288:21	113:2 132:18	209:3,6,11
234:1 235:1	294:13	174:7 178:22	210:8 221:15
236:1 237:1		178:24 179:16	222:2,12,16,23



## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

**[drivers - elder]**

Page 22

223:3,9,12	206:10 208:18	157:8 169:24	<b>economics</b>
224:9,14	209:23 210:2	176:19 179:5	219:5
225:12 229:23	210:15 222:14	181:12 182:8	<b>economies</b>
229:25 230:8	223:11 230:10	189:13 201:6	155:23
230:10,13	232:11 249:16	208:22 227:12	<b>economy</b> 23:12
231:12,20	269:12 288:11	233:5 236:2	42:24 74:8
232:10 233:15	293:6	250:8,18 251:8	97:2 98:12
236:13 237:16	<b>drop</b> 49:6	252:2 257:5	103:3 108:5
237:20 238:16	76:18	272:9 273:4	150:16 155:21
245:25 246:14	<b>dropped</b> 76:20	274:18 279:6	155:24 159:17
247:20,25	80:13	280:7	159:24 160:8
248:5,9,14,21	<b>drove</b> 132:5	<b>early</b> 155:13	211:22 220:2
249:2,8,10,13	209:22 292:21	188:8 228:11	241:11 265:9
249:16 251:8	<b>drunk</b> 76:14,19	288:21 289:4	265:12 267:14
251:13 252:7	78:8 79:19	<b>earn</b> 71:24	271:5
252:24 255:3,9	<b>dubal</b> 107:13	171:18 257:11	<b>edit</b> 243:5
255:25 256:22	107:21 118:13	289:12	<b>edited</b> 108:12
256:23 257:7	242:14 243:15	<b>earners</b> 254:7	243:10
257:16 260:23	<b>dubious</b> 250:24	254:17	<b>editorial</b>
260:25 261:7,9	<b>due</b> 250:24	<b>earnings</b> 72:6	127:24
261:11 262:9	<b>duis</b> 76:18	<b>easier</b> 16:19	<b>education</b>
262:24 263:17	<b>duly</b> 9:12 295:8	<b>east</b> 109:11	111:3
264:10 269:18	<b>dynamic</b>	110:12,15	<b>effective</b>
270:25 272:2	278:15	<b>eat</b> 293:7	240:25
279:8,11,17,20	<b>e</b>	<b>eating</b> 271:21	<b>effects</b> 258:24
281:9,12,17,21	<b>e</b> 2:2,2,16,16	<b>echoed</b> 254:6	<b>eight</b> 101:7
287:12 288:3,7	3:2,9 221:20	<b>economic</b>	282:16
<b>driving</b> 33:15	295:2,2 297:3	218:20 219:9	<b>either</b> 18:9 29:4
65:19 70:23	<b>e.g.</b> 187:2,4	249:22 257:8	39:24 64:15
73:10 76:15,20	195:23 218:19	279:13	93:14 135:12
111:18 112:16	262:14 273:22	<b>economically</b>	227:15 271:21
132:3 170:2	<b>earlier</b> 54:4,25	257:20 258:12	294:4
171:13 204:17	96:4 140:13	258:15 280:8	<b>elder</b> 72:7
205:6,6,14			

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[elderly - ethnographer]

Page 23

<b>elderly</b> 171:24	<b>empirical</b>	273:11	<b>entirely</b> 14:22
<b>electrical</b>	134:23 197:15	<b>ends</b> 289:7	168:9 187:23
108:20,25	211:17 243:18	<b>engage</b> 243:18	238:5 245:7
110:19	264:22	277:13	267:20
<b>element</b> 275:8	<b>empirically</b>	<b>engaged</b> 216:15	<b>entitled</b> 33:14
275:11	185:24 186:8	<b>engagement</b>	<b>entity</b> 37:3
<b>elements</b>	231:7 289:17	152:9 164:23	<b>entry</b> 71:22
239:15 273:21	<b>employee</b>	<b>engaging</b>	171:16
276:3	225:22	214:17	<b>environment</b>
<b>ellis</b> 2:8 9:7	<b>employees</b>	<b>engineering</b>	203:11
<b>else's</b> 118:12	40:18 61:16	108:20,21,25	<b>environments</b>
<b>elucidating</b>	62:2 226:8	109:9 110:20	181:7
186:24	227:8,18,25	<b>enjoy</b> 109:20	<b>equally</b> 39:5
<b>email</b> 54:7,9	233:9,12 237:8	109:20 274:10	<b>equals</b> 166:19
<b>emailed</b> 26:8	<b>employment</b>	277:14	<b>equivalent</b> 90:4
<b>emails</b> 26:11,13	71:25 98:14,16	<b>enjoyable</b>	<b>era</b> 65:21
246:8 247:16	171:19 175:11	274:2	112:12
247:19	<b>enactment</b>	<b>enshitification</b>	<b>errata</b> 296:7,9
<b>embedded</b>	69:16	228:21	296:12,15
137:14 237:3	<b>encoded</b> 241:21	<b>ensuring</b> 274:3	298:9
243:8 245:16	<b>encounter</b>	<b>entail</b> 97:21	<b>especially</b>
<b>embodied</b>	130:6 268:12	147:9	230:9
242:11	268:13	<b>entered</b> 111:9	<b>esq</b> 2:4,4,9,9
<b>embody</b> 242:4	<b>encounters</b>	<b>entering</b> 8:24	<b>essay</b> 108:10
<b>emergement</b>	268:17	<b>enterprises</b>	<b>essence</b> 49:21
293:16	<b>encourage</b>	96:15	165:18
<b>emerging</b> 96:14	256:20,21	<b>enters</b> 76:18	<b>essentially</b>
103:6 181:25	273:23	<b>entice</b> 232:10	60:16
293:5	<b>encouragement</b>	274:13	<b>estimate</b> 20:7
<b>emphasis</b>	262:2	<b>enticing</b> 271:6	<b>et</b> 149:2 193:16
103:12	<b>encourages</b>	<b>entire</b> 21:18	<b>ethical</b> 227:10
<b>emphasizes</b>	256:22	45:22 111:11	<b>ethics</b> 130:18
99:24 171:22	<b>ended</b> 109:17	187:20 239:24	<b>ethnographer</b>
177:5	210:25 225:23	285:9	73:2 74:4,16

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

**[ethnographer - experiences]**

Page 24

75:7,25 109:4 109:5 178:20 199:5 <b>ethnography</b> 75:11 143:21 208:2 <b>ethological</b> 203:8 <b>ethos</b> 155:24 <b>evaluate</b> 74:22 106:8 126:24 127:7,21 224:19 272:5,6 <b>evaluated</b> 129:13 <b>evaluating</b> 105:21 <b>events</b> 152:11 201:5 <b>everyone's</b> 30:3 <b>evidence</b> 120:20 125:10 127:19 154:7 250:14 293:15 <b>evident</b> 100:7 153:7 <b>evolve</b> 155:18 <b>evolved</b> 72:10 <b>exact</b> 138:21 139:3,6 188:19 <b>exactly</b> 15:6 21:4 25:5 34:22 42:16 50:11 65:22	79:9 92:8 142:18 146:4,9 183:24 198:25 200:2 205:16 213:7 214:12 246:24,24 259:20 270:13 <b>examination</b> 3:4 9:15 291:22 <b>examine</b> 144:6 234:9 <b>examined</b> 9:13 <b>example</b> 81:9 121:23 123:10 131:15 132:4 134:24 135:15 136:16 139:4 145:19 159:3 195:15 198:8 229:5 238:18 239:12,15,18 243:4,12 247:15 250:20 250:22 256:7 264:9 271:17 277:13 <b>examples</b> 79:17 79:20 80:20,25 83:9 113:15 132:13 164:25 189:24 237:4 250:18	<b>except</b> 7:20 298:7 <b>exchange</b> 169:11 218:20 219:9 <b>excited</b> 16:15 16:16 280:19 <b>excused</b> 294:19 <b>executed</b> 206:10 <b>executive</b> 96:13 <b>exercise</b> 163:13 163:21 176:10 216:11 244:4 246:23 264:3 278:8 282:23 <b>exercised</b> 66:17 67:4,8 280:4 <b>exercising</b> 277:11 <b>exert</b> 236:13 <b>exerting</b> 68:13 68:23 248:13 248:17 271:22 <b>exhibit</b> 3:12,15 3:18,22 4:3,7,9 4:11,13,16,20 5:3,6 10:7 11:12,16 12:11 18:17,22,25 19:4 25:15,19 27:7,8,12 30:13,17 33:2 33:7 34:25	35:11,12 39:17 53:8 55:14 59:5,9,12 84:19,24 85:15 85:16 114:10 114:15 142:4,8 156:15,18 162:15,19,22 184:15,20 194:3 234:13 <b>exhibits</b> 156:22 <b>exist</b> 44:15 274:24 275:17 <b>existing</b> 102:22 181:23 <b>exit</b> 168:4 <b>expect</b> 39:24 127:3 <b>expected</b> 154:13 <b>expense</b> 35:20 <b>expenses</b> 222:23 <b>experience</b> 127:15 137:4 154:14 199:7 205:7 222:22 223:3 254:6 255:2 290:4 293:18 <b>experienced</b> 223:9 254:19 <b>experiences</b> 74:5 184:5
---	--	---	--

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[experiences - feelings]

Page 25

196:7 255:25 <b>experiential</b> 177:6 293:10 <b>experiment</b> 43:15 259:5,18 259:22 260:13 <b>experimentat...</b> 260:4 290:22 <b>experimenting</b> 259:23 291:2 <b>experiments</b> 258:20,21 260:2,17 <b>expert</b> 5:3 35:5 35:6,11 39:8 42:18 55:22,25 56:7,21 58:13 83:5,18 86:6 94:22 98:16 106:15 117:24 118:9 119:21 127:3,7 128:8 128:16 292:6 <b>expertise</b> 58:17 62:13 68:8 69:7 79:15 82:16 117:9 126:15 154:17 160:7 237:12 <b>experts</b> 38:2 <b>expires</b> 298:19 <b>explain</b> 73:24 185:11	<b>explains</b> 212:16 <b>explanation</b> 69:22 <b>explicit</b> 129:25 <b>explicitly</b> 151:2 267:24 287:20 <b>exploited</b> 47:16 <b>explore</b> 139:21 <b>explored</b> 290:12 <b>express</b> 153:22 <b>expressed</b> 152:21 153:22 159:25 <b>extent</b> 27:2 35:18 36:24 53:15 187:12 227:13 265:3 267:10 285:20 <b>extra</b> 24:13 <b>extract</b> 293:16 <b>extrapolating</b> 135:22	<b>fact</b> 125:8 138:18,18 149:3 155:9 159:20 190:25 192:13 208:16 274:11,14 279:16 288:19 <b>factors</b> 115:3 <b>factory</b> 139:5 <b>facts</b> 62:2 88:7 <b>faculty</b> 98:4,22 <b>fail</b> 296:17 <b>fair</b> 17:2 24:25 34:21 62:19 65:11 77:16 80:23 82:18,19 83:21 86:10,19 87:12 88:4,8 92:7 93:18,18 93:21 95:15 97:13 112:5,9 120:4,7 123:9 123:16,24 129:7 141:2 166:21 177:10 189:5 224:3 226:17,24 230:23 245:3 253:9,13 254:25 255:16 255:20 264:8 264:23 280:13 286:15 292:12 293:22	<b>fallacy</b> 178:6 <b>familiar</b> 16:6 60:6 65:24 79:21 107:14 183:3 191:19 221:25 <b>famous</b> 164:21 <b>far</b> 19:13 35:25 36:15 53:12 94:25 117:2 187:5 244:4,13 <b>fashion</b> 14:25 209:20 <b>fast</b> 16:10 161:10 225:5 <b>favors</b> 251:18 <b>feature</b> 172:7 <b>features</b> 66:10 245:11 <b>feedback</b> 99:9 99:10 265:8,13 <b>feeds</b> 229:7 <b>feel</b> 48:15 69:10 82:13 125:11 128:10 132:15 136:15 140:25 188:20,23 190:14 197:16 219:2 270:22 272:19 278:24 284:14 286:4 <b>feeling</b> 75:22 <b>feelings</b> 278:23
	<b>f</b> <b>f</b> 290:17 295:2 <b>face</b> 144:17 293:13 <b>facilitate</b> 218:20 219:9 221:18 <b>facilitates</b> 221:14		

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[fellow - follows]

Page 26

<b>fellow</b> 98:23 99:9 <b>felt</b> 81:4,13,14 83:2 110:3 132:12 152:9 197:10,10 <b>feminization</b> 148:20 <b>feminized</b> 34:13 <b>field</b> 65:8 75:7 75:11 76:5 87:6 99:23 100:6 101:2,4 101:11,13,20 102:10,18 124:16,23 125:2 130:6 157:13 177:4,7 181:16 183:18 185:13 188:2 190:9 208:19 210:8,24 293:11 <b>fields</b> 101:14 130:7 <b>figure</b> 10:6 157:13 290:3 <b>filed</b> 8:11 37:22 <b>final</b> 38:10,11 38:11,12,18,19 114:5 143:2,6 194:5 294:12	<b>finally</b> 240:22 <b>financial</b> 41:15 208:19 <b>find</b> 38:5 39:24 76:17 95:25 124:12 125:4 125:10 145:19 149:21 161:7 174:7 260:22 289:19 <b>finding</b> 138:21 139:6,7 201:4 <b>findings</b> 149:3 <b>fine</b> 10:22 95:18 143:4 216:6 <b>finger</b> 92:18 284:17 <b>fingertips</b> 18:10 <b>finished</b> 24:15 38:21 112:13 218:10 <b>fire</b> 180:23,24 181:5 <b>firm</b> 8:17 22:13 54:22 55:6 193:14 <b>first</b> 9:12 13:8 14:13 21:8 36:3 57:4 60:24 69:3 71:3 85:17 87:18 111:13	116:4,12 120:10,24 157:11 174:2 215:10 218:21 231:13 240:15 268:3 269:11 270:7 283:24 285:15,18 292:5 <b>fit</b> 15:14 34:9 140:15 187:13 187:20 <b>fits</b> 14:14 215:16,16 <b>fitting</b> 77:15 <b>five</b> 63:12 64:5 87:11 90:5,6 152:24 159:21 207:3 281:20 281:21 283:15 <b>fix</b> 261:5 <b>flag</b> 87:7 <b>flex</b> 72:6 <b>flexibility</b> 71:22 72:16,22 73:3,8,13 74:20,23 75:14 113:21 160:22 169:13,14,19 170:2,21 171:16,23 172:8,15,18 257:4 271:3	<b>flexible</b> 73:4,6 75:23 174:8 <b>floor</b> 215:10 <b>flow</b> 207:5 <b>flush</b> 69:21 122:12 220:9 <b>focus</b> 80:20 81:25 91:7 111:10 130:8 141:7 148:2 189:2 211:12 212:14 215:17 <b>focused</b> 26:18 88:12 108:7 111:14 141:8 214:16,21 253:12 261:6 <b>focusing</b> 187:2 <b>focussed</b> 88:5 281:10 <b>focusses</b> 189:9 <b>folder</b> 11:20 <b>folks</b> 157:25 227:22 <b>follow</b> 41:5 171:3 186:16 213:19 267:3 274:8 292:3 <b>followed</b> 203:5 <b>following</b> 62:16 141:21 <b>follows</b> 9:13 149:14
---	--	--	--

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[footnote - front]

Page 27

<b>footnote</b> 71:16	123:25 124:24	260:3,18	<b>found</b> 59:24,25
<b>footnotes</b> 39:16	126:6 128:5	261:13 269:5,8	71:7 125:7,19
<b>force</b> 256:19	129:3,23 131:2	269:19 271:13	138:21,25
<b>forces</b> 74:7	132:20 136:19	272:7 275:3,21	139:3 263:12
256:17	137:5,13,25	277:15 278:10	<b>foundation</b>
<b>foregoing</b>	141:19 150:12	278:21,22	105:20,22
38:13 295:7	150:18 151:21	279:22 281:3	186:10 269:20
298:4	154:20 161:2	284:7 288:11	<b>foundational</b>
<b>forgetting</b> 13:8	162:9 164:14	288:16 298:8	186:24
<b>form</b> 7:21	166:11 167:19	<b>formal</b> 225:25	<b>founders</b>
21:24 22:8	169:21 170:4	<b>former</b> 93:15	185:17
25:8 33:21	173:9 174:19	226:8	<b>four</b> 35:4 87:19
34:13 41:21	175:7 177:13	<b>forming</b> 39:8	240:13 241:13
42:15 43:10	177:25 179:2	93:13 226:14	243:22 256:4
45:13,18,20	180:9 181:17	238:22 286:3	<b>fourth</b> 26:16
46:19 47:6	182:6,17	<b>forms</b> 42:20	<b>frame</b> 240:19
48:7,23 49:23	185:23 186:2,9	258:23	<b>framework</b>
61:10 62:10	189:11 190:23	<b>formulating</b>	278:9
64:17 65:6	193:6 195:2	42:14	<b>framing</b> 63:4
68:6,13,14,23	196:15 201:25	<b>forth</b> 31:12,14	<b>francisco</b> 1:4
68:24 72:17	202:23 219:12	36:14 52:12	8:13
73:15,20 74:25	220:19 221:2	204:7 229:4	<b>frank</b> 125:3
75:16 79:13	221:16 222:25	272:13	<b>fraud</b> 261:22
81:7 82:12	223:16 224:21	<b>forthcoming</b>	262:9
88:15,24 90:17	229:18 233:21	231:5	<b>free</b> 56:24
98:19 102:17	235:16,21	<b>forum</b> 210:8	261:11
103:15 104:7	236:20,25	264:15	<b>french</b> 110:21
104:11 106:15	238:4 244:6,15	<b>forums</b> 263:14	<b>frequent</b>
106:17,25	246:16,22	263:17 264:11	190:12
111:24 115:17	248:3,15,23	292:25 293:4	<b>frequently</b>
118:18 119:3	249:4 251:23	<b>forward</b> 63:4	102:9 234:16
119:15,24	252:16,25	161:10 212:5	<b>friendly</b> 151:7
120:8 121:11	255:5 256:24	236:9	<b>front</b> 11:23
122:21 123:7	257:25 259:19		18:11 163:24

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[front - give]

Page 28

283:19 <b>fueling</b> 270:9 <b>full</b> 9:20 34:19 132:21 167:25 170:15 219:3 <b>fully</b> 194:18 263:20 279:5 <b>fun</b> 274:2,14,16 277:24 <b>functionality</b> 228:19 <b>funny</b> 109:6 <b>fuoco</b> 67:22 <b>further</b> 7:9 28:5 31:11 159:14 169:10 244:2 253:22 291:8 293:25 <b>future</b> 96:13 139:13,18,20 143:16 289:15	277:10 <b>gamification</b> 136:15 137:9 176:8 273:19 274:21 275:16 276:12 277:9 278:3,19,24 279:5 <b>gamified</b> 277:14 <b>gamifying</b> 273:20,25 <b>garcia</b> 87:19,20 <b>gas</b> 223:5 <b>gears</b> 54:18 108:16 117:21 <b>gender</b> 34:7 108:4 139:22 <b>general</b> 42:21 47:25 66:5 93:8 94:14 102:19 125:19 136:15 141:10 141:17 145:15 160:16 179:5 188:5,25 202:21 205:2 227:19 229:15 238:2 239:5,8 241:6,10 247:11,12,14 263:12 279:13 281:16 283:10 286:19	<b>generality</b> 91:20 <b>generalizability</b> 131:18 138:13 139:9 140:3 141:4,15 144:18,22 145:8,12,14 146:8,11 202:6 202:12,13,15 <b>generalizable</b> 46:3 104:17 137:24 138:3,7 138:11,17 145:24 146:2 146:10 201:24 <b>generally</b> 17:15 70:13,19 88:11 92:19 137:4 237:6 262:13 <b>generated</b> 52:24 106:14 <b>generates</b> 102:11 183:4 <b>generating</b> 182:16,21 <b>generation</b> 182:25 187:3 189:19 190:6 <b>geoffrey</b> 2:9 9:6 54:6 <b>geoffrey.wyatt</b> 2:11	<b>geographic</b> 197:11,22 198:19 <b>geotracking</b> 283:21 291:4 <b>getting</b> 49:17 87:24 113:24 120:5 133:11 134:11 151:9 204:9 206:17 215:17 226:20 229:25 267:8 289:16 <b>ghost</b> 108:2 243:7 <b>gig</b> 23:12 42:23 61:3 63:8 70:5 70:11,17 97:2 98:12 103:3 108:5 148:20 160:8 211:22 220:2 241:11 271:5 <b>give</b> 10:8 12:16 16:19 17:13 18:18 27:24 34:4 41:11 49:3 80:16 97:23 99:8,8 99:13 132:21 134:23 143:9 170:7 178:17 183:7 204:15 220:7 239:13
<b>g</b>			
<b>gains</b> 138:25 <b>game</b> 147:16 273:21 274:13 276:9,14 277:24 <b>games</b> 137:8,8 137:12 140:7,8 140:23 141:3,7 145:20,22 274:10 275:14 276:2,21			

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[give - grounded]

Page 29

264:8,20	185:15 186:22	184:14 185:8,9	<b>graduate</b> 96:14
273:17	187:15 194:2	186:17 194:2	113:23
<b>given</b> 35:6	194:13 197:13	195:21,22	<b>grain</b> 216:6
83:11 98:9	198:18 204:5	201:3 214:3	<b>grand</b> 104:18
160:7 179:14	205:21 207:5	217:20 234:11	<b>granted</b> 260:5
233:14 262:12	212:8 215:13	236:9 242:15	<b>granular</b>
262:12 279:16	228:10 238:25	246:11 253:15	284:12
295:12 298:6	239:2,10,16	256:3 257:12	<b>grasp</b> 194:18
<b>gives</b> 148:24	243:21 253:21	259:3,5,8	<b>great</b> 9:25 12:3
174:20 271:2	261:21 268:2	266:5,6,8	12:11 28:21
<b>giving</b> 17:8	269:25 278:12	272:12 282:2	33:10 38:8
46:6 64:8	282:6 291:10	291:12 294:8	54:10 85:10
99:10,10	<b>goal</b> 287:12	<b>golden</b> 188:12	105:12 201:16
114:21 230:13	<b>goals</b> 161:23	<b>good</b> 8:4 9:18	217:19 229:5
234:9	256:12	9:19 15:17,18	241:13 282:5
<b>glaser</b> 183:11	<b>goes</b> 50:12 71:6	65:4 73:9 81:3	282:15
183:13 185:17	74:2 100:3	83:24 87:4	<b>greater</b> 24:15
188:6,8,15,16	106:10 148:7	128:8 136:4	<b>greatly</b> 170:22
<b>go</b> 10:20 17:15	197:20,21,23	145:17 146:5	<b>green</b> 271:22
17:16 37:20	242:21 244:13	151:22,23	<b>greenwashing</b>
42:25 43:25	247:24 268:14	156:3 178:18	150:19
52:18 55:13	<b>going</b> 8:4 10:23	195:15 217:12	<b>grew</b> 151:5
63:3 66:15	11:11 13:21	217:16 231:25	<b>grievances</b>
84:14 91:11	16:9 25:13	240:4 246:12	83:17
96:4 98:20	26:21 37:22	246:14,22	<b>ground</b> 100:6
99:16 102:4,6	60:21 63:4	247:5,8 261:5	183:19 196:2
114:25 115:2	81:10 84:2,19	265:23 269:3	<b>groundbreaki...</b>
117:3 119:5	86:12 94:3	278:19 282:19	103:2
124:6 125:22	95:9 99:10	<b>govern</b> 153:12	<b>grounded</b>
130:12 135:10	106:3 109:15	<b>government</b>	99:18 182:24
139:11 143:15	130:13 134:16	110:25 131:25	183:5,8,21,22
149:7,20 161:6	146:7,20 156:2	<b>gps</b> 261:17	185:11,16
163:7 172:17	156:20,20	<b>gradual</b> 21:21	186:23 187:6
176:13,14	158:8 166:22		189:2,7 190:7



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

**[grounded - hinges]**

Page 30

200:15 213:23 214:7 264:23 <b>grounds</b> 42:4 239:25 <b>group</b> 133:6,23 194:14 254:18 281:13 <b>groups</b> 200:10 200:21 281:9 <b>grow</b> 258:24 262:16 <b>guess</b> 90:4 91:13 120:5 214:8 267:6 275:7 277:7 287:4 <b>guidelines</b> 5:8 47:14 65:17 184:25 <b>gulch</b> 180:23	132:3 138:22 139:2 145:20 149:16 151:13 151:19 153:12 153:17 154:18 155:4,8 156:8 157:14 160:17 178:21 192:22 210:7 211:23 222:17 231:12 231:14 249:24 260:22 <b>half</b> 122:5 152:24 159:22 <b>hallmarks</b> 138:4 <b>hand</b> 153:10 295:14 <b>hanly</b> 2:3 9:3 <b>happen</b> 176:17 176:19 251:11 <b>happened</b> 22:15 47:19 180:25 205:9 <b>happening</b> 74:14 76:4,6 161:2 216:9 243:11 <b>happens</b> 92:3,4 135:10 136:11 167:2 274:17 <b>happy</b> 17:16 29:25 294:5,7	<b>hard</b> 51:25 214:24 <b>harder</b> 66:9 <b>harmed</b> 47:16 <b>harsh</b> 251:14 251:15 <b>harvard</b> 4:7 98:4 <b>hastings</b> 107:19 <b>head</b> 80:22 93:8 102:2,5 146:21 169:6 178:17 206:5 215:20 236:18 254:24 284:24 <b>heading</b> 123:12 <b>heads</b> 200:17 <b>health</b> 72:6 110:5 171:23 <b>hear</b> 123:18 287:3 <b>heard</b> 180:24 185:6 <b>hearing</b> 57:5,11 83:19 <b>hearings</b> 58:5 58:13,18 60:5 60:5 85:18 <b>heart</b> 74:2 <b>heavily</b> 131:16 <b>held</b> 57:5 <b>heller</b> 2:18 8:14 <b>help</b> 29:25 60:12 71:9	178:11 189:2 202:10,18 <b>helped</b> 70:24 99:6 <b>helpful</b> 40:19 63:4 69:22 128:25 146:14 <b>helping</b> 153:11 <b>helps</b> 74:12 181:19 195:25 202:15 270:22 <b>heterogeneous</b> 149:2 <b>heterogenically</b> 106:6 <b>hey</b> 109:14 216:24 <b>hid</b> 210:17 <b>hides</b> 278:25 <b>high</b> 87:15,17 94:18 95:20 96:23 125:17 181:7 231:15 265:20 286:7 <b>higher</b> 276:24 <b>highest</b> 198:11 <b>highland</b> 240:13 <b>highlighted</b> 169:25 <b>highly</b> 100:5 102:14 190:17 <b>hinges</b> 185:19
<b>h</b>			
<b>h</b> 3:9 79:4 193:18 <b>hail</b> 78:16 <b>hailing</b> 41:20 58:22 61:4,8 71:7 76:18 79:3,6 92:10 92:14 94:13,17 97:3,8 107:18 115:3,6,8 116:3,24 117:4 117:11 121:25			

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[hired - importantly]

Page 31

<b>hired</b> 21:5 58:2 58:3	23:17 24:5,6 24:12,16 36:16	<b>ideas</b> 24:10 217:4,7 287:18	<b>immigrants</b> 242:22
<b>hiring</b> 96:22	256:11,18	289:22	<b>immigration</b>
<b>history</b> 43:16 44:22 198:15	273:24 287:13	<b>identical</b> 91:20	108:4
200:23	292:22	<b>identification</b>	<b>impact</b> 101:3
<b>hold</b> 76:24 77:2	<b>housed</b> 208:17	11:15 18:21	280:25
91:9 95:8	<b>huge</b> 214:25	25:18 27:11	<b>impactful</b>
97:14 141:25	<b>huh</b> 29:12	30:16 32:25	100:5,14,19,20
146:11,12	142:22 143:7	59:8 84:23	100:22
173:18 182:13	144:19 174:11	114:14 142:7	<b>imperative</b>
234:10 247:9	284:21	156:14 162:18	296:14
<b>holding</b> 128:2	<b>huhs</b> 16:8	184:19	<b>implement</b>
<b>holland</b> 13:11	<b>human</b> 47:15	<b>identified</b>	244:6
13:15	<b>humans</b> 241:20	44:16	<b>implementing</b>
<b>home</b> 71:9	<b>hundreds</b>	<b>identify</b> 49:6	144:3
222:16	42:23	63:12 84:20	<b>implications</b>
<b>honest</b> 62:12	<b>hurt</b> 47:16	285:5	4:17 142:20
160:6 164:18	<b>hypotheses</b>	<b>identifying</b>	200:22 249:21
220:21 245:8	186:13	43:21 49:7	<b>implies</b> 143:2
<b>honestly</b> 40:11	<b>hypothesis</b>	<b>identities</b>	150:20 271:12
79:14 150:13	182:16,20,25	245:21	<b>importance</b>
266:17	183:4 185:23	<b>identity</b> 245:23	161:14 288:12
<b>hope</b> 242:14	186:8 187:3,4	<b>iii</b> 122:18	<b>important</b>
<b>hopefully</b>	189:19 190:6	<b>il</b> 2:5	52:20 68:5
114:21	<b>hypothetical</b>	<b>illustrate</b> 31:18	124:22 126:3
<b>host</b> 99:11	107:3 179:3	259:19	131:12 137:11
<b>hour</b> 17:15	224:22 251:24	<b>illustrations</b>	172:7 181:15
76:14 156:3	<b>i</b>	52:23	191:5 193:3,8
<b>hourly</b> 237:21	<b>i.e.</b> 66:17 67:14	<b>images</b> 210:21	193:12 207:6
237:23 238:3,7	<b>ice</b> 230:15	<b>imagine</b> 116:10	215:3,5 246:25
238:8,10,14	<b>idea</b> 37:17 67:8	<b>immersion</b>	267:5 273:12
<b>hours</b> 20:8,11	201:7 241:18	99:24 177:5	288:19,20
20:20 21:16		<b>immigrant</b>	<b>importantly</b>
		243:3	71:21 171:15

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

**[imposing - institutional]**

Page 32

<b>imposing</b> 270:11	<b>included</b> 40:7,8	90:2 161:21	<b>information</b> 4:17 36:15
<b>impossible</b> 286:21	<b>includes</b> 56:15 106:5 116:19	280:5	42:5 45:11
<b>imprecise</b> 165:7 166:16	214:14 235:12	<b>individual's</b> 293:18	46:13 49:22
<b>impression</b> 263:23,24 264:7,21	235:13 292:23	<b>individuals</b> 40:13 44:23	53:16 95:11
<b>inaccuracy</b> 159:3	<b>including</b> 8:19 23:7 32:11	49:22 61:16	96:2 131:16,22
<b>inaccurate</b> 125:13 161:3	37:4 41:19	67:19 80:18	132:18 142:20
<b>inaccurately</b> 124:14	42:6 46:14	81:4 90:6	143:12,18
<b>inappropriate</b> 80:4,5	50:18 86:7	192:5 255:22	207:18,23
<b>inaudible</b> 14:2 15:8 47:20 114:18,22 138:23 216:25 253:22 287:22	136:24 144:17	258:12 260:7	208:7 262:17
<b>inbox</b> 54:9	144:21 259:15	<b>induce</b> 287:12	<b>informed</b> 205:7 208:10 227:19 289:23
<b>incentive</b> 96:21 198:7 287:8	<b>inclusive</b> 23:18	<b>industrial</b> 13:22	<b>ingredients</b> 201:21
<b>incentives</b> 176:8 283:20 286:12 287:12 287:25 288:5 288:13	<b>income</b> 223:10 289:12	<b>industry</b> 33:16 58:23 92:19 97:8,11 107:18 121:25 149:16 149:25 151:18 152:15 153:18	<b>inherently</b> 65:25
<b>incident</b> 49:9	<b>incomplete</b> 124:13 125:12 179:3 224:22 251:24 269:20	<b>inferences</b> 132:10	<b>initial</b> 252:22
<b>incidents</b> 76:17	<b>increase</b> 71:7	<b>inflection</b> 232:11	<b>inputting</b> 225:8 266:11
<b>include</b> 174:7 208:18 210:7	<b>incredible</b> 273:11	<b>influence</b> 166:23 225:11 265:5 268:5 282:25	<b>inside</b> 195:18
	<b>independent</b> 60:25 61:9,15 61:24 115:7,19 115:20 233:9 233:12,16 237:9	<b>influenced</b> 172:23 265:12	<b>insider</b> 152:15
	<b>index</b> 6:2	<b>influences</b> 266:4	<b>insight</b> 154:14
	<b>indicated</b> 7:15 295:8	<b>inform</b> 130:21 259:9	<b>insights</b> 33:15 144:14 174:6 194:14
	<b>individual</b> 74:5 74:11,14 75:21 75:22 89:25		<b>instacart</b> 212:3
			<b>instant</b> 251:17
			<b>instantly</b> 249:25 251:9
			<b>institute</b> 98:24
			<b>institutional</b> 42:6 43:6,7 44:6 46:14,17

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[institutional - invoice]

Page 33

46:24 47:11 49:18 50:13 <b>instruct</b> 95:9 <b>instructions</b> 64:9 296:2 <b>insufficient</b> 203:15 <b>insurance</b> 223:5 <b>intake</b> 44:13 <b>integrity</b> 227:5 <b>intellectual</b> 127:2 284:13 <b>intelligence</b> 110:17 <b>intend</b> 20:3 <b>intending</b> 118:10 275:19 <b>intense</b> 267:12 <b>intensification</b> 243:23 245:12 258:11,14 266:10 267:12 <b>intensified</b> 280:7 <b>intensifies</b> 173:5 <b>intent</b> 275:10 <b>interact</b> 240:23 <b>interactions</b> 284:12 <b>interchangea...</b> 64:20	<b>interdisciplin...</b> 110:24 <b>interest</b> 272:23 276:22,22 <b>interested</b> 52:15 134:15 203:3 295:13 <b>interesting</b> 128:7 166:13 182:19 191:24 223:19 244:17 279:24 289:6 289:20 <b>interests</b> 274:4 274:25 <b>interface</b> 221:6 238:20 <b>intermediary</b> 218:18 219:3 219:11,23,24 220:11,14 <b>internal</b> 226:21 <b>internet</b> 98:5 <b>interpret</b> 14:17 272:15 <b>interpretation</b> 272:8 <b>interpretations</b> 180:6 <b>interpretive</b> 148:8 178:8,12 180:11,13,16 <b>interpretivist</b> 148:16	<b>interrupt</b> 280:16 <b>interview</b> 43:2 45:22 46:7 48:13 132:17 133:3,17 134:20 178:25 179:15,17 202:21 205:20 205:21,23 206:13,15,20 206:21 207:13 208:6,8 226:2 <b>interviewed</b> 72:5 78:15 112:24,25 113:2,5 193:19 203:4 209:3,6 209:11 229:23 230:8 292:24 <b>interviewing</b> 112:18 113:7 133:5,6,13 134:9 178:22 192:23 204:20 204:24,25 205:3 214:6 <b>interviews</b> 41:17 42:12 50:16 51:4 112:21 132:23 132:24 147:15 177:17 181:4 205:11,12,18	207:3,5,19,20 207:22,25 208:4,11,15,19 208:22 209:25 210:4,7 211:3 212:24,25 213:6,12 272:17 288:7,9 <b>introduce</b> 10:7 25:14 30:12 59:4 84:19 156:23 162:15 184:14 <b>introduced</b> 33:5,6 <b>introducing</b> 114:9 156:18 <b>introduction</b> 144:13 <b>introductions</b> 156:22 <b>inuit</b> 203:9 <b>invasiveness</b> 266:3 <b>inventor</b> 183:16 <b>investigated</b> 250:4 <b>invisible</b> 244:5 244:8,14,21 245:4 <b>invite</b> 226:4 <b>invoice</b> 19:6,12 19:14,25 20:9
---	---	--	---

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[invoice - know]

Page 34

20:13,15 21:8 25:7 35:24 36:18 38:5 54:8 84:18 85:5 <b>invoices</b> 20:4 35:18 <b>involve</b> 94:16 <b>involved</b> 55:22 88:2 90:10 94:12 99:5 241:15 260:6 292:18 <b>involvement</b> 35:20 37:2 <b>involving</b> 55:9 94:13 <b>iphone</b> 230:14 <b>iran</b> 94:5 <b>irb</b> 43:12 44:11 47:22 49:20 50:2,7 <b>issue</b> 25:7 82:10 91:15 239:7 251:6,10 254:19 <b>issues</b> 57:19,20 72:7 87:5 89:7 95:6 119:22 128:20 131:4 155:3 171:24 <b>item</b> 57:4 58:25 <b>items</b> 85:18,19	<b>iterative</b> 203:24 214:14 214:15,21 <b>ix</b> 122:4,8,8,12 <b>j</b> <b>janitors</b> 240:22 <b>jeans</b> 265:24 266:2 <b>jeff</b> 294:11 <b>jersey</b> 281:6 <b>jo</b> 2:4 9:2 17:25 22:13 34:4 52:14 54:20 55:6 159:11 <b>job</b> 1:25 16:19 75:24 96:21 110:11 133:12 225:23 247:8 265:23 272:19 <b>jobs</b> 61:3 222:20 <b>joe</b> 281:5,8 <b>johnston</b> 13:9 13:18 <b>joint</b> 244:23 <b>joseph</b> 5:4 13:12 121:4 124:13 125:4 128:11 <b>journal</b> 13:22 101:8 185:7 188:3,3 190:16	<b>journalist</b> 132:8 <b>journalists</b> 132:8 <b>journals</b> 97:25 107:10,13 127:25 <b>jpollock</b> 2:6 <b>judgment</b> 259:17 <b>judgments</b> 247:4 <b>june</b> 20:14,16 20:21 21:2,8 21:11,18 55:2 <b>juno</b> 78:17 <b>k</b> <b>kameswaran</b> 4:22 <b>katie</b> 2:9 9:8 <b>keep</b> 36:16 44:21 137:13 232:10 267:8 273:10 282:2 <b>keeps</b> 274:14 276:8 <b>kept</b> 116:10 <b>key</b> 67:8 143:12 144:14 159:4,9 271:4 <b>kherkher</b> 87:19 87:20	<b>kin</b> 295:12 <b>kind</b> 23:2 79:5 95:11 109:19 112:11 121:8 123:14 130:8 193:14 206:8 206:10 207:5 210:23 212:12 228:24 234:22 235:14 254:19 259:23 260:20 284:18 286:10 <b>kinds</b> 207:22 <b>kirkland</b> 2:8 9:7 <b>kirkland.com</b> 2:11 <b>kirstina</b> 9:4 <b>klein</b> 98:5,10 <b>knee</b> 136:5,6 <b>know</b> 14:2 16:2 17:12,18,24 23:25 28:22 29:23 36:22 43:15 44:4 47:21 48:10,14 49:12 53:21,23 58:14 60:4 63:18 64:6 67:22 71:19 73:7 76:2 78:15 83:4,15 83:16 86:24 90:3 92:14
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## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[know - legal]

Page 35

94:14,19,21,25	209:5,7,9	<b>known</b> 103:23	278:2
95:2,20 102:5	215:7 216:23	204:11	<b>lastly</b> 76:12
103:7 104:20	216:24 217:2	<b>knows</b> 93:19	<b>laundering</b>
104:22 105:10	219:4,21 223:8	<b>kristina</b> 2:4	266:13
106:4,13,18	224:8 225:16	<b>kruger</b> 13:11	<b>law</b> 98:4,14,17
107:5 109:10	226:7 227:8	13:15	106:16,24
110:8,12	228:2 229:7	<b>l</b>	107:10,10,13
111:19 113:17	230:14 232:7	<b>l</b> 2:16 4:13	111:3 115:25
113:22 114:2	237:15 239:20	107:21 193:18	128:16 129:2
115:19 117:3,8	241:18 244:17	<b>label</b> 87:6	129:11 175:19
121:24 123:6	246:11 247:22	<b>labor</b> 64:7	<b>lawsuits</b> 87:11
123:19 124:9	252:20 253:3,8	218:12,17,25	<b>lawyers</b> 37:5
125:8 126:8	254:16,24	233:20 234:14	139:4 145:21
127:15,23,24	255:18 261:22	234:19 235:2,3	282:11
128:19 129:10	264:13 266:15	235:5,9,13	<b>lays</b> 64:11
130:8 131:13	269:22 275:18	262:13 263:13	<b>lead</b> 243:23
132:19 133:6	276:18 278:7	263:15 266:11	<b>leaders</b> 183:17
134:11 136:14	279:3 285:2	<b>lack</b> 186:10	183:19
136:17 140:5	290:18 292:23	269:20	<b>leading</b> 236:2,5
140:12,13,16	293:6	<b>lacks</b> 131:16,18	272:25
140:22 141:15	<b>knowing</b> 117:8	<b>laid</b> 239:21	<b>leads</b> 145:25,25
148:19,25	255:4,10	<b>lane</b> 174:3	275:2
150:23 151:6,8	286:20	<b>language</b> 46:12	<b>learned</b> 110:8
152:10 153:9	<b>knowledge</b>	149:22 166:15	<b>lease</b> 115:8
154:17 156:3	42:17,21,24	<b>languages</b>	<b>leave</b> 167:23
157:20,23	93:8 102:20	86:25	231:12
161:7 167:21	103:17,19	<b>laptop</b> 18:11,13	<b>led</b> 223:21
168:13,16,18	124:17 135:25	<b>large</b> 195:5	<b>left</b> 122:19
169:2,22	136:11 148:17	<b>largely</b> 244:8	158:22 282:4
180:23 185:4	152:14 178:9	285:7	282:14
190:18 191:18	181:23 227:20	<b>larger</b> 69:16	<b>legal</b> 1:21
198:15 200:16	237:18 286:20	208:17 242:25	61:20 62:8,11
201:16 203:7	286:24	271:16 277:20	87:5 107:2
207:17 209:2,4			115:24 118:19

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[legal - lindsey]

Page 36

122:22 128:21	<b>levels</b> 113:23	19:1 20:1 21:1	111:1 112:1
130:17 154:21	133:13 240:13	22:1 23:1 24:1	113:1 114:1
238:22	<b>lexicon</b> 186:25	24:24 25:1	115:1 116:1
<b>legislation</b>	<b>licenses</b> 237:17	26:1,2 27:1	117:1 118:1
153:11	<b>lie</b> 136:10	28:1 29:1 30:1	119:1 120:1
<b>legislative</b> 83:8	<b>lieu</b> 7:10	31:1,2 32:1	121:1 122:1
83:11 85:18	<b>life</b> 109:21	33:1 34:1 35:1	123:1 124:1
<b>lens</b> 105:5	132:14 218:13	36:1 37:1 38:1	125:1 126:1
130:3	<b>lifecycle</b> 228:12	39:1 40:1 41:1	127:1 128:1
<b>lenses</b> 76:8	<b>likely</b> 102:15	42:1 43:1 44:1	129:1 130:1
<b>letter</b> 37:16	254:15 262:15	45:1 46:1 47:1	131:1 132:1
<b>letters</b> 36:25	263:7,10	48:1 49:1 50:1	133:1 134:1
37:14	<b>lim</b> 185:4	51:1 52:1 53:1	135:1 136:1
<b>letting</b> 10:9	<b>limitation</b>	54:1 55:1 56:1	137:1 138:1
29:22	141:14 190:20	57:1 58:1 59:1	139:1 140:1
<b>level</b> 70:22	190:25 191:2	60:1 61:1 62:1	141:1 142:1
72:21 74:14	<b>limitations</b>	63:1 64:1 65:1	143:1 144:1
76:5 87:15,17	139:13,17	66:1 67:1 68:1	145:1 146:1
91:19 94:18	144:17,21	69:1 70:1 71:1	147:1 148:1
95:21 124:18	172:9,12	72:1 73:1 74:1	149:1 150:1
125:3,18	<b>limited</b> 37:4	75:1 76:1 77:1	151:1 152:1
128:12 152:20	41:19 102:23	78:1 79:1 80:1	153:1 154:1
153:6 154:11	103:24 140:2	81:1 82:1 83:1	155:1 156:1
159:16,23	141:11 169:15	84:1 85:1 86:1	157:1 158:1
160:2 176:10	170:22	87:1 88:1 89:1	159:1 160:1
179:6 188:25	<b>limits</b> 172:14	90:1 91:1 92:1	161:1 162:1
193:5,14	220:14,15,16	93:1 94:1 95:1	163:1 164:1
194:20 195:8	<b>lindsey</b> 1:1,13	96:1 97:1 98:1	165:1 166:1
198:11 216:7,7	2:1 3:1,5,20	99:1 100:1	167:1 168:1
218:17 260:6	4:1 5:1 6:1 7:1	101:1 102:1	169:1 170:1
260:24 261:8	8:1,9 9:1,11,22	103:1 104:1	171:1 172:1
265:21 275:24	10:1 11:1 12:1	105:1 106:1	173:1 174:1
276:24 280:10	13:1 14:1 15:1	107:1 108:1	175:1 176:1
	16:1 17:1 18:1	109:1 110:1	177:1 178:1



## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[lindsey - locations]

Page 37

179:1 180:1	247:1 248:1	<b>link</b> 60:9,9	285:7,21
181:1 182:1	249:1 250:1	234:19	<b>little</b> 35:16
183:1 184:1	251:1 252:1	<b>linked</b> 138:25	36:17 42:9
185:1 186:1	253:1 254:1	271:3	53:4 71:19
187:1 188:1	255:1 256:1	<b>linking</b> 202:6	72:13 114:23
189:1 190:1	257:1 258:1	<b>list</b> 26:17 32:7	163:3 165:11
191:1 192:1	259:1 260:1	35:2,10,13	197:2,7 199:12
193:1 194:1	261:1 262:1	40:23 51:20	210:22 215:9
195:1 196:1	263:1 264:1	52:16 55:16	221:11 245:22
197:1 198:1	265:1 266:1	57:4 83:7,10	250:8 253:16
199:1 200:1	267:1 268:1	85:13,19 94:11	253:22 277:17
201:1 202:1	269:1 270:1	245:15	287:4
203:1 204:1	271:1 272:1	<b>listed</b> 23:18	<b>live</b> 60:15
205:1 206:1	273:1 274:1	39:10	<b>lived</b> 196:6
207:1 208:1	275:1 276:1	<b>listening</b> 49:4	293:7
209:1 210:1	277:1 278:1	186:16	<b>livelihood</b>
211:1 212:1	279:1 280:1	<b>listing</b> 116:11	249:22
213:1 214:1	281:1 282:1	<b>lists</b> 152:10	<b>liveries</b> 115:4
215:1 216:1	283:1 284:1	<b>literacy</b> 105:15	115:15
217:1 218:1	285:1 286:1	<b>literally</b> 214:6	<b>lives</b> 76:14
219:1 220:1	287:1 288:1	<b>literature</b> 23:8	203:9
221:1 222:1	289:1 290:1	23:9,11 24:9	<b>living</b> 109:11
223:1 224:1	291:1 292:1	54:2 61:19	139:19
225:1 226:1	293:1 294:1,18	62:7 129:20	<b>ljc</b> 1:7
227:1 228:1	295:1,7 296:1	161:19 176:5	<b>llp</b> 2:8
229:1 230:1	297:1 298:1	188:19 198:22	<b>located</b> 17:20
231:1 232:1	<b>lindseycamer...</b>	206:17 214:8	<b>location</b> 246:2
233:1 234:1	3:22	217:3 221:20	246:15 247:23
235:1 236:1	<b>line</b> 6:5,9,14,18	234:23 272:12	268:12
237:1 238:1	19:16 67:14	284:20,22,23	<b>locationally</b>
239:1 240:1	130:14 239:16	293:21,23	262:14
241:1 242:1	277:4 297:5	<b>litigation</b> 1:7	<b>locations</b> 248:5
243:1 244:1	<b>lines</b> 48:12	23:7 39:7,10	249:3
245:1 246:1	284:24	52:10 284:5,19	



## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[locke - make]

Page 38

<b>locke</b> 188:12	188:2,24	49:10 51:2	173:8
<b>locked</b> 168:17	190:17,25	67:23 97:8	<b>lying</b> 80:18
<b>log</b> 167:17	193:24 211:25	99:7 107:17	<b>lynch</b> 155:7
168:3,7,23	219:16,23	108:11 110:8	<b>m</b>
170:20 173:3	232:25 250:21	116:2,19	<b>m</b> 67:14 193:17
205:9	<b>looked</b> 22:20	118:14 130:5	193:18
<b>logged</b> 167:2,8	31:13,17 32:2	132:3 137:19	<b>machine</b>
167:10,18,24	36:6 77:14	150:7 159:10	295:10
168:6,24	92:11 181:3	184:11 190:15	<b>made</b> 14:5
170:23	196:23 233:4	197:12 198:17	15:10 62:16
<b>logic</b> 224:2	243:14 263:22	210:16 213:20	125:11 127:11
<b>logically</b>	<b>looking</b> 20:12	216:24 229:3	129:10 137:20
127:18	20:15 24:21	230:3 235:11	149:14 155:12
<b>logs</b> 209:23	58:24 59:21	253:10 262:2	181:5 188:22
<b>long</b> 27:18	66:7 85:15	267:22 278:25	200:20 244:9
52:12 110:12	127:13 134:11	286:2	289:2 296:8
111:8,22 180:2	149:22 173:22	<b>lots</b> 73:5 77:4	<b>madness</b> 240:8
239:16 287:15	181:18,24	104:23 126:20	<b>maffie</b> 13:21
<b>longer</b> 17:16	190:15 193:23	176:6	15:3,11 230:25
27:3 134:14	196:14 199:22	<b>love</b> 221:17	266:12
273:24 287:13	249:14 270:20	<b>low</b> 71:21	<b>main</b> 241:18
<b>longitudinally</b>	286:9	171:15	<b>maine</b> 281:18
292:24	<b>looks</b> 19:8	<b>loyalty</b> 117:3	<b>majority</b>
<b>look</b> 26:23 40:6	20:13,15 29:15	198:9 225:14	190:14 197:4
72:24 74:4,6	31:9 33:13	232:9,9 266:6	208:9 257:6
75:25 82:21	59:23,23 63:7	283:20 284:2,6	279:16,19
85:4,5 100:25	85:23 184:4	284:10 285:14	284:14
103:5,21	195:16 199:23	286:7 290:6	<b>make</b> 14:16,23
107:15 111:5	203:8 219:17	<b>lyft</b> 78:17 86:3	15:20 16:11,18
131:8 132:9	254:2 267:23	86:13 90:10	33:25 34:12
134:16 147:17	281:21	91:23 92:13	51:2,13 86:24
148:11,18	<b>lot</b> 22:12,13,14	132:5 150:6	91:13,15
150:15 179:16	22:15,25 23:15	152:24 153:2	102:15 104:23
184:8 187:19	24:8 44:19	159:21 169:3	

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[make - md]

Page 39

105:5 136:2 137:2 151:6 170:15 179:7 181:9 193:10 201:22 202:18 202:21 208:15 208:20 211:9 236:8 242:2 271:5 276:6 296:5 <b>makes</b> 13:24 24:17 118:17 119:2,4 135:21 212:9 259:25 267:14 <b>making</b> 61:22 61:24 65:17 68:19 115:22 126:25 127:12 136:12 170:18 188:22 229:19 241:22 247:4 <b>manage</b> 63:20 63:25 64:4,4,5 64:7,14,19 <b>management</b> 4:16 41:23 61:18 64:12 66:5,11,14,20 67:20 74:7 88:14,23 89:15 92:12 96:8 99:18,23 100:7 101:15 108:21	111:11 116:13 116:18,22 122:2 142:20 144:3,7,13 161:18 165:2 167:11 170:24 173:4 177:4 188:13 191:2 193:4 194:4,15 194:18 195:4,7 195:12,16 203:11 223:15 224:13 225:10 225:25 226:20 234:12 235:21 236:4,10,14 237:2 241:9 242:4 243:8,23 245:13 249:20 265:4,5 266:22 270:3 282:23 283:11,17 <b>manager</b> 265:25 <b>managerial</b> 144:9 276:21 <b>managers</b> 144:12 235:11 <b>managing</b> 96:14 <b>manifests</b> 281:12 <b>mann</b> 180:23	<b>manner</b> 7:14 <b>manuscript</b> 142:25 <b>manuscripts</b> 28:4 <b>map</b> 104:25 <b>marc</b> 185:4 <b>marijuana</b> 78:7 79:18 <b>mark</b> 11:11 27:6 54:12 <b>marked</b> 6:17 11:15 18:21 19:3 25:18 27:11 30:16 32:25 59:8 84:23 114:14 142:7 156:14 162:18 184:19 <b>market</b> 196:5 262:13 263:13 263:15 <b>marketing</b> 188:3,4 190:17 <b>marketplace</b> 220:4 <b>marketplaces</b> 220:3 <b>marxist</b> 234:15 <b>masks</b> 65:19 <b>massachusetts</b> 90:9 91:25 92:21,24 93:3 285:25	<b>master's</b> 109:25 110:7 <b>mastered</b> 156:21 <b>masters</b> 108:19 <b>match</b> 154:12 197:11 266:5 <b>matched</b> 198:16 225:13 <b>matches</b> 122:2 134:21 198:19 221:21 230:4 <b>matching</b> 64:8 198:10 215:8 215:13 247:25 249:2,10 266:7 283:19 <b>material</b> 43:9 <b>materials</b> 6:11 18:8,12 32:9 38:24 39:18 40:9,23 41:14 44:12,15 45:12 46:18 47:2 48:6 51:16,19 52:10,17 92:23 93:3,12 214:15 285:21,22 293:3 <b>matter</b> 8:10 12:16 <b>mba</b> 109:13,16 <b>md</b> 1:6
---	--	--	---

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[mdl - methodology]

Page 40

<b>mdl</b> 3:20 5:4 9:5 <b>mean</b> 21:4 23:10 24:8 40:20 47:7 48:24,25 51:23 53:4 57:25 58:16 63:16 64:3 73:24 78:21 82:25 91:22 93:24 95:20 97:19 99:9 105:17 112:6 113:17 115:22 117:7 117:13 119:17 125:16 126:18 127:9 129:19 129:24 131:4 132:7 134:2 136:21 137:14 137:17,18 138:11,13 141:6,7 143:17 145:12 147:12 150:9 151:16 152:23 154:19 166:8 167:21 168:21 173:10 174:24 178:15 179:13,24 181:2 184:8 186:15 188:5 189:23 196:16	200:3,12 204:24 210:20 223:25 226:10 226:17 229:14 241:7 247:16 249:15 250:13 254:9 255:2,13 258:21 259:14 260:8 261:14 264:16 266:3 266:20 270:20 278:18 279:23 280:16 281:5 282:8 287:16 293:5,11 <b>meaning</b> 62:18 170:15 240:14 <b>meanings</b> 138:15 <b>means</b> 78:8 81:20 92:6 150:16 201:19 <b>meant</b> 170:16 232:18 278:3 279:9 <b>measure</b> 104:21 271:25 272:4 <b>measurements</b> 104:24 <b>measuring</b> 280:25 <b>mechanics</b> 91:18	<b>mechanism</b> 145:18 190:3 267:5 271:7 <b>mechanisms</b> 136:10 259:13 268:16 271:5 <b>medallion</b> 115:10 <b>media</b> 8:7 84:10 158:17 218:5 229:6 <b>median</b> 199:23 <b>mediated</b> 253:18 264:5 <b>medium</b> 125:6 <b>meeting</b> 62:22 76:16 <b>meetings</b> 22:19 22:22 <b>meets</b> 240:16 <b>memoing</b> 272:14 <b>memoranda</b> 52:22 <b>memory</b> 174:3 <b>memos</b> 214:17 216:10,11 <b>men</b> 139:19 <b>mention</b> 12:19 13:16,21 65:15 210:6 225:22 240:10 <b>mentioned</b> 13:13,18 18:6	22:24 44:13 52:4 54:3 70:24 90:8 121:14 133:22 140:13 208:21 214:13,23 227:11 252:2 253:7 257:5 <b>mentioning</b> 163:16 246:21 <b>mentions</b> 212:2 <b>mentor</b> 109:14 <b>merchants</b> 218:20 <b>messages</b> 247:19 <b>met</b> 22:13 132:5 <b>metapore</b> 278:15 <b>method</b> 74:21 103:5 177:19 177:24 178:7 182:25 240:7 <b>methodologies</b> 100:9,16 <b>methodology</b> 99:22 124:19 126:4 130:24 131:6,17 176:15,17,18 177:3,10 183:9 212:6,7 213:13 214:3 217:11
--	---	--	---

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[methodology - name]

Page 41

218:10 292:12 292:18 293:19 <b>methods</b> 100:4 100:13,15,21 101:9 138:15 143:21 144:17 177:11 184:12 185:22 186:7 189:13 192:7 192:13 213:3 213:15 <b>metric</b> 101:18 127:6 <b>metro</b> 41:21 132:2 <b>michael</b> 276:19 <b>micro</b> 70:22,22 111:13 <b>mid</b> 1:21 <b>middle</b> 109:11 110:12,15 199:23 <b>mike</b> 230:25 <b>mileage</b> 223:4 <b>milgram</b> 260:2 <b>mind</b> 12:23 13:2,5 116:8 116:12 120:21 126:12 145:23 155:14 192:9 207:7 229:20 <b>mine</b> 47:25 284:14	<b>minimum</b> 201:10 237:23 238:7,8,10,14 242:20 <b>minneapolis</b> 238:13 <b>minority</b> 148:14 257:7 257:16 279:17 <b>minute</b> 10:21 18:18 35:16 41:11 55:17 116:16 117:23 170:18 211:16 273:17 <b>minutes</b> 156:9 156:21,23 217:18 <b>misq</b> 193:18 <b>missed</b> 126:21 287:9 <b>missing</b> 109:2 275:8 <b>misspoke</b> 157:18 <b>mistake</b> 86:24 155:12 <b>mistakenly</b> 33:23 <b>mistakes</b> 149:13,13,21 <b>misunderstan...</b> 159:15	<b>mix</b> 22:23 <b>model</b> 117:2 139:21 148:13 190:2 <b>models</b> 52:23 <b>moment</b> 62:3 168:14 <b>monday</b> 101:6 <b>money</b> 257:11 276:6 <b>monitor</b> 268:21 <b>monitoring</b> 246:8 247:15 291:4 <b>monitors</b> 225:3 225:5 247:19 <b>months</b> 21:22 204:7,9 <b>mood</b> 246:9 <b>morning</b> 20:9 33:7 <b>motivation</b> 96:21 97:7 <b>motivations</b> 135:10 <b>motor</b> 246:5 <b>move</b> 70:2 76:10 82:24 232:19 <b>movements</b> 245:18 <b>moves</b> 127:2 <b>movie</b> 94:4	<b>moving</b> 32:5 159:2 215:18 <b>multi</b> 222:16 277:3 <b>multifaceted</b> 72:25 <b>multiple</b> 45:3 133:11,19 138:20 139:6,7 139:8 147:13 167:22 168:7 168:16 192:21 192:22,23,24 192:24 222:17 247:9 256:8 <b>mystery</b> 265:22 <b>möhlmann</b> 193:16 194:8 <b>möhlmann's</b> 195:14 <b>n</b> <b>n</b> 2:2,16 3:2 193:18,18 201:16,17,19 203:14,17 <b>nailed</b> 271:7 <b>name</b> 8:14,24 9:21 13:8,9 25:2 32:11,11 60:6 107:20 121:24 122:6 149:10,16
--	--	---	--

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[names - number]

Page 42

<b>names</b> 40:15 43:20 44:14 227:22	257:11 267:3,7 <b>needed</b> 52:10 125:2 193:24	189:3,14 190:2 216:19 217:7 237:24 281:6	<b>notes</b> 41:14 50:18,18 52:22 53:5 210:8
<b>narration</b> 74:11	<b>needs</b> 122:12 240:16	<b>newark</b> 281:5	<b>notice</b> 3:19 25:14,25 27:15 30:25 31:7,13 32:7 295:8
<b>narrative</b> 174:19 184:4,6	<b>negative</b> 64:15 278:23	<b>nice</b> 34:12 <b>nick</b> 117:12 <b>nikil</b> 60:2	<b>notion</b> 185:19 <b>nots</b> 265:10 <b>notwithstandi...</b> 159:20
<b>narratives</b> 74:9 216:23 236:19 236:20 270:24	<b>neighborhood</b> 259:6,8	<b>nikil's</b> 60:10,20 <b>nine</b> 201:17 <b>nn9</b> 201:15	<b>not</b> 265:10 <b>notwithstandi...</b> 159:20
<b>narrow</b> 40:20	<b>neither</b> 295:12	<b>nod</b> 4:4	<b>noun</b> 219:16
<b>narrower</b> 287:5	<b>neo</b> 237:3	<b>noes</b> 16:8 <b>non</b> 39:10	<b>novelty</b> 181:15 181:21,21
<b>narrowing</b> 134:18	<b>nested</b> 74:6 271:16	<b>normative</b> 65:5 236:23 237:3 266:23	<b>november</b> 1:16 8:6 294:12 295:15
<b>national</b> 105:20 105:22 135:14	<b>network</b> 71:8 258:24	<b>norms</b> 44:7 99:21 177:2 241:21	<b>nuance</b> 233:14
<b>nature</b> 57:11	<b>networks</b> 259:5	<b>north</b> 139:20 208:23 209:6 210:3,6 211:18	<b>number</b> 3:11 4:2 5:2 8:7 11:16 18:22 20:8 25:19 26:24 27:12,25 28:6,8 29:4,4,7 29:7,9,9,10,13 30:17 31:18 32:6,7 33:2 35:2,17 36:23 37:9,13 38:10 38:23 41:13 50:15 51:8,15 51:18 52:21,25 53:14 59:9 70:9 76:19
<b>nearly</b> 113:19	<b>neutral</b> 64:16 64:21,23,24,25 242:6 248:25 278:20 279:5	<b>northern</b> 1:3 8:12	
<b>necessarily</b> 211:14 274:8	<b>never</b> 43:23 44:2 77:11 104:13 107:4 185:6 217:5 242:5 272:21 272:25 273:14	<b>notary</b> 1:17 295:6,19 298:25	
<b>necessary</b> 17:17 241:6 296:5	<b>nevertheless</b> 153:15 172:9	<b>note</b> 13:6 36:17 65:23 78:3 91:4 139:18 142:24 170:12 173:14	
<b>need</b> 17:11 67:24 120:20 125:14 136:5 144:8 157:5 170:6 187:22 195:8 199:15 199:18 201:10 202:12 222:2 227:7 238:17 239:9 250:21	<b>new</b> 98:24 102:11,13,20 103:2,6,13,17 103:19,20,21 104:3 162:15 181:19,20	<b>noted</b> 91:3 296:12 298:9	

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[number - oh]

Page 43

84:10,24 86:3 86:7 87:20 94:11 100:25 101:11 114:15 142:8 156:15 158:17 162:19 184:20 200:14 200:20 201:10 208:14 218:5 263:18 277:25 <b>numbers</b> 36:22 85:24 100:7 101:19 <b>nw</b> 2:10	73:15,20 74:25 75:16 79:13 81:7 82:12 88:15,24 90:17 98:19 102:17 103:15 104:7 104:11 106:17 106:25 111:24 115:17 118:18 119:3,15,24 120:8 121:11 122:21 123:25 124:24 126:6 128:5 129:3,23 131:2 132:20 136:19 137:5 137:25 141:19 150:12 151:21 154:20 162:9 164:14 166:11 167:19 169:21 170:4 173:9 175:7 177:13 177:25 179:2 180:9 181:17 182:17 186:2,9 187:14,17 189:11 190:23 193:6 195:2 196:15 201:25 202:23 219:12 220:19 221:2 221:16 222:25 223:16 224:21	229:18 233:21 235:16 238:4 246:16 248:3 248:15,23 251:23 252:16 252:25 255:5 256:24 257:25 261:13 269:19 271:13 275:3 275:21 277:15 278:10 279:22 281:3 284:7 288:16 <b>objecting</b> 131:3 <b>objection</b> 91:3 93:23 153:19 187:18 244:15 <b>objections</b> 4:4 7:14,20 30:24 32:16 37:22 38:13 <b>objective</b> 178:7 <b>objects</b> 42:3 53:17 <b>oblique</b> 234:2 <b>observation</b> 81:6 99:24 147:15 177:5 197:18 292:21 <b>observations</b> 210:8 <b>obtain</b> 68:11 226:13	<b>obtained</b> 150:6 <b>obviously</b> 114:4 236:7 <b>occur</b> 12:24 13:3 <b>ochutu</b> 117:12 <b>october</b> 11:25 29:2,5 <b>odor</b> 34:13 148:20 <b>offended</b> 16:17 16:17 <b>offer</b> 155:2 271:18 <b>offering</b> 175:17 268:20 <b>office</b> 215:2 <b>officer</b> 93:16 <b>official</b> 295:14 <b>oftentimes</b> 287:13 <b>oh</b> 8:25 15:17 28:7,16 29:3 29:12,14,21 37:21 47:3 71:17 86:10 94:12 95:15 97:10 118:12 131:23 149:22 160:16 162:10 194:10 215:23 241:7 249:11 254:22 258:22 270:16 272:20
<b>o</b>			
<b>o</b> 2:16 <b>o'neill</b> 2:9 9:8 <b>oath</b> 7:10,11 10:3 <b>obfuscate</b> 270:3 273:20 <b>obfuscates</b> 279:2 <b>object</b> 21:24 22:8 25:8 33:21 42:15 43:10 45:6,13 45:20 46:19 47:6 48:7,23 49:23 61:10 62:10 64:17 65:6 68:6,14 68:24 72:17			

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[oh - okay]

Page 44

282:15	36:19,23 37:18	99:12,16	174:16 175:14
<b>okapaku</b> 94:21	38:3,8,23	100:17 101:17	175:14,21
118:4 119:13	39:21 40:10	102:8 105:8	176:13 177:15
120:6,10 121:8	41:9 43:5 45:5	107:22,25	177:23 178:5
121:14,18,20	46:11,22 49:16	108:16 109:22	178:11,19
124:23 128:3	50:5,14,14	109:22 111:17	180:21 182:3
130:24 149:14	51:7,10,15	111:22 112:5	183:6 184:13
151:17 152:7	52:2,21 53:7	112:15 113:4	185:8 186:19
152:24 158:22	53:14,24 54:5	113:14 114:7,8	189:5,18
159:21 162:23	54:10,18,24	114:19,25	194:12 199:2
165:4 207:23	55:5,13 56:6	115:13 116:14	200:4,8 202:10
<b>okapaku's</b>	56:23 57:3,14	117:16,16,17	202:19 204:14
24:19 25:2	57:18,23 58:9	118:15 119:11	205:11,17
122:6 155:2	58:11,24 59:18	120:24 122:17	206:8 207:14
207:17	60:7,11,23	123:18 124:5	207:16 209:24
<b>okay</b> 9:23 10:6	62:5,15,25	124:22 125:25	210:5 211:6,21
11:24 12:3,7	63:21 64:3	128:14,18	212:5,12,16,22
12:11,21 13:4	65:11 66:8,15	130:23 131:8	214:5,13,20
15:19,23 16:2	67:10 70:21	133:2 134:13	215:7,15,20,23
16:21,25 17:19	71:17 73:19	139:11 140:19	216:10,15
17:23 18:12,16	75:20 76:9	143:4,11,15,20	217:9,10,17
19:2,24 20:2	77:3,8,12,12,20	144:25 146:14	219:10 220:16
20:12,20,25	77:25 79:10	146:14,22	220:23 221:24
21:10,14,20	80:23 82:6	147:8,24 149:7	223:14 224:3
22:5,16,24	83:6,13,21,25	150:9 153:15	226:12 227:11
23:17,21 24:6	85:10,23 86:4	155:9 156:11	228:9,9 231:3
24:6,25 25:6	86:18,21,22	157:4,20 158:3	231:9,9 232:16
25:12,22 26:20	87:14 88:4,10	158:4,7 161:17	232:25 233:19
27:21 28:11,18	90:7,7,8,23	162:4,13 163:7	235:5,24 236:6
28:21 29:12,14	92:2,22 93:6,9	163:25 165:3	237:15,25
29:15 30:7,23	94:9,24 95:4	166:4,8 168:6	239:12 240:2,7
32:4,22,22	95:18,24 96:3	168:25 169:7	240:8 241:17
33:10 34:16,23	97:9,13,13	170:10 171:6	243:13,20
35:15 36:9,12	98:3,11,13	172:6 173:6	245:9,9 247:2

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[okay - organizational]

Page 45

247:11,22	<b>okpaku's</b> 121:5	<b>operating</b>	<b>opportunity</b>
248:8,12 249:6	124:13 125:4	67:11 162:2	71:23 171:17
249:11,17,17	128:11 131:5	221:8 246:5	174:8 252:14
250:17 251:6	159:3	<b>opining</b> 247:18	292:2 293:20
251:17,21	<b>old</b> 102:14	256:17	<b>opposed</b> 103:21
252:12,20	<b>older</b> 141:5	<b>opinion</b> 12:20	115:9 151:13
253:5,5 254:16	190:8	40:12 76:23	155:8 258:14
254:25,25	<b>onboarded</b>	77:2 79:11	263:14,19
255:20 256:2	222:7	81:2 82:3,20	277:9 287:23
256:16,21	<b>onboarding</b>	83:5,18 90:24	<b>opposite</b> 135:7
257:22 258:18	231:13	94:25 106:15	<b>optional</b> 269:13
260:20 261:7	<b>once</b> 43:21	155:2 159:22	<b>order</b> 52:11
262:5,11	77:14 167:10	159:25 163:10	95:17 194:17
263:21,25	167:18 170:22	175:17 245:3	<b>organization</b>
264:25 265:15	172:10,13	246:13,18	37:5 96:22
267:16,25	173:3 215:12	247:12 251:12	133:14 165:20
268:2,9 269:7	<b>ones</b> 56:2 81:15	251:16 252:18	240:17 244:10
269:10,24,24	81:16 208:12	286:3	245:20 256:13
271:8 272:22	257:19,20	<b>opinions</b> 12:15	266:15,18
273:13,16,17	<b>online</b> 143:22	34:18 38:25	270:4 275:10
275:17 277:7	256:10 262:16	39:8 41:22	275:19 276:13
278:18 279:6	262:25 263:20	42:14 52:11	276:23 281:11
279:19 280:19	264:15,18	53:10 72:10	283:6
281:25 282:6	288:10 292:25	82:24 88:12,20	<b>organization's</b>
282:15,20,22	<b>oops</b> 27:7 91:9	92:24 93:14	161:23 274:4
283:4,14,23	232:4	95:14 113:10	<b>organizational</b>
284:4 285:20	<b>open</b> 71:2	118:4 121:9	68:2 69:16
286:9 288:12	72:23 142:10	213:16 226:14	76:5 88:13,22
290:2,9,15	214:15,21	238:23 284:6	89:12,14 95:6
291:3,6,7	263:13 273:11	284:25	99:17,23 100:6
<b>okpaku</b> 5:4	<b>operate</b> 221:10	<b>opportunities</b>	101:15,16,16
13:12 15:6	<b>operates</b>	139:17 225:11	111:11,14,16
124:14 169:11	220:23 221:4,4	248:9,21	130:3,21 136:8
			161:13,13,19



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

**[organizational - papers]**

Page 46

161:19 162:5,5 163:17,23,24 164:3 165:13 165:19 172:23 175:22 177:4 181:6 188:18 193:5 194:20 195:8 231:20 232:6 233:3,8 233:17,19 234:20,22 235:2,15,21 239:4 243:24 244:6 264:4 270:4 275:15 276:15 280:3 280:12,24 282:24 <b>organizational...</b> 276:16 <b>organizations</b> 74:12 176:9 218:12 228:12 244:5 258:19 264:3 265:2,17 268:5,10,15 270:8 273:20 274:25 <b>organizing</b> 181:7 <b>origin</b> 150:15 <b>original</b> 28:14 288:3 296:15	<b>outcome</b> 202:16 295:13 <b>outline</b> 206:24 206:25 207:12 236:7 240:5 282:14,17 <b>outlines</b> 38:11 207:9 <b>output</b> 205:6 <b>outside</b> 56:21 62:13 69:7 79:15 82:15 116:22 208:23 210:6 211:7,18 237:25 284:5 293:23 <b>outsource</b> 265:3 <b>overall</b> 197:5,6 260:18 288:18 <b>overlapping</b> 178:16 <b>overprescribi...</b> 239:14 <b>overview</b> 5:7 184:24 218:12 <b>own</b> 50:13 52:19 115:8 122:7 123:21 130:8 136:24 173:7 174:9,13 174:15 175:2,6 189:8 196:14 204:17 220:10	222:23 224:12 230:14 250:10 250:13 261:12 270:25 284:5 284:24 285:12 <b>owning</b> 115:10 <b>p</b> <b>p</b> 2:2,2,16 200:14,19 <b>p.m.</b> 1:17 8:5 10:24 11:4,4,8 84:3,6,6,10 158:9,12,12,16 217:21,24,24 218:4 291:13 291:16,16,20 294:9,22 <b>package</b> 97:11 <b>pad</b> 36:17 <b>page</b> 3:4,11 4:2 5:2 6:5,9,14,18 12:4 26:16 30:6 60:12,24 63:6 70:4 91:9 91:12 115:2 139:13 163:7 185:12,15 186:22 194:13 264:3 282:13 282:16 297:5 <b>pages</b> 27:18 298:4	<b>paid</b> 19:22 58:2 58:3 87:24 210:16 229:25 242:20 <b>paint</b> 74:13 <b>palatable</b> 149:2 <b>palpability</b> 106:5 <b>paper</b> 12:8 14:8 15:15,18 28:3 28:3,16 53:5 71:13,14,18 101:2 106:4 113:24 114:4 117:10,14 130:14 151:2 173:16 174:18 177:20 179:13 188:11 194:9 196:6 211:19 214:24,25 215:15 236:24 264:12 266:21 275:13 288:22 <b>papers</b> 27:23 43:25 45:23 63:22 92:17 101:5,8 102:5 114:3 127:16 136:21 137:6 166:6 173:15 177:15 181:3 191:3 213:22 247:7 287:19
---	---	---	--

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[papers - pennsylvania]

Page 47

287:24 <b>paragraph</b> 60:23 65:16 76:11 78:3 91:11 96:6,12 97:15 99:17 121:21,22 122:7 123:11 124:8,11 127:10 131:14 149:10,12 158:22 159:2 161:7,18 163:9 169:8 176:19 195:21 199:4 204:16 210:5 212:20 213:18 213:19 218:16 231:10,22 232:8,14,15 233:5 238:25 239:3,13 240:9 241:23 242:3 243:21 244:3 245:10 249:18 253:17 256:3 258:18 262:11 268:3,9 270:16 274:18 283:25 292:6,11 <b>paragraphs</b> 120:25 121:7 121:14,17,20 122:18 123:12	212:7 285:10 <b>parameters</b> 14:4 <b>paraphrase</b> 242:15 <b>pardon</b> 15:23 <b>parental</b> 271:23 <b>parentheses</b> 170:14 <b>part</b> 34:3 37:12 42:13 53:9,11 65:20 69:3 77:9 90:16 91:8 92:11 93:16 95:2 104:22 120:10 120:14 121:3 123:21 127:9 140:24 154:25 160:9,10 167:4 167:7,21 171:12 177:18 197:19 216:11 226:10 239:21 242:25 243:19 262:6 271:9,11 275:13 293:19 <b>partial</b> 261:24 <b>participant</b> 177:16 195:23 197:18 <b>participants</b> 43:18 139:18	210:9 <b>participate</b> 47:24 240:24 <b>participating</b> 7:3 <b>participation</b> 163:11 166:10 166:19 <b>particular</b> 101:8 119:21 133:8,24 219:16 240:18 266:25 <b>particularly</b> 230:7 <b>parties</b> 7:12,20 37:24 218:19 219:8 230:15 <b>partnered</b> 227:2 <b>parts</b> 90:14,19 119:12 120:6 127:20 148:25 237:2 <b>party</b> 115:9 295:13 <b>passenger</b> 1:7 <b>passengers</b> 174:7 <b>passing</b> 259:17 <b>past</b> 23:22 35:4 101:7 169:19 209:15 286:18 293:4,8	<b>path</b> 108:24 <b>pattern</b> 44:22 <b>pause</b> 76:9 240:6 <b>paused</b> 25:10 <b>pauses</b> 240:3 <b>pay</b> 87:21 88:2 224:9,14 225:13 237:20 238:9 288:18 288:18,25 289:5 <b>paying</b> 223:10 223:13 <b>pdf</b> 12:8 <b>peacemaking</b> 188:21 <b>peer</b> 28:8 43:25 46:6 63:23 82:3 106:10 124:20 127:25 136:23 138:19 151:8,8 <b>pelta</b> 2:18 8:14 <b>penalized</b> 78:4 242:22 261:21 <b>penalties</b> 262:6 <b>penalty</b> 66:18 67:17,19 <b>pennsylvania</b> 1:19 2:10 57:6 96:9 97:16 295:3
---	---	--	---

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[people - pin]

Page 48

<b>people</b> 22:13 34:11 44:23 47:23 66:11 76:3,15 77:17 78:16,21 80:11 105:17 106:21 108:12 110:23 117:13 125:17 126:9 128:9 132:3 133:6,13 133:23 134:8,9 134:20,20 137:13,19 138:20 139:3,6 145:10 150:7 150:11,14 160:11,24 164:25 166:21 167:22 168:2 168:15,19,21 168:23 179:6 179:17 181:6 190:13 192:24 197:10 203:3 204:20,25 205:3 214:7 225:5 230:2 233:11 254:19 257:13 259:23 263:19 267:3 273:6,11 274:19 276:18 279:3 289:12 292:24	<b>people's</b> 176:7 200:16 243:16 285:8 <b>percent</b> 60:24 61:2 76:20 101:11 257:17 257:17,23,23 258:4,7 279:7 279:8 <b>performance</b> 96:22,23 161:22 265:3 <b>performed</b> 177:18 <b>period</b> 22:18 111:12 168:18 <b>permanent</b> 254:9 <b>permission</b> 49:18 <b>person</b> 7:11 22:23 37:3 65:18 70:25,25 74:22 76:14 80:16 119:6 133:5 137:15 148:18 187:25 203:4 262:15 264:14,19 <b>personal</b> 71:8 83:19 132:13 252:9,17 <b>personally</b> 81:22,24 252:6	<b>perspective</b> 72:20 75:6,10 76:6 82:22 130:17,17,18 130:19 138:12 143:17,18 144:8,9 145:13 152:3 164:13 227:7 <b>perspectives</b> 148:6,23 195:25 <b>petition</b> 47:9 <b>ph.d.</b> 24:24 <b>phd</b> 109:13,15 109:17 111:6 124:15,23 125:2,14 135:8 <b>phds</b> 128:9 <b>phenomenolo...</b> 184:4 <b>phenomenon</b> 103:2,6,21 139:4 181:19 181:24 201:3 243:11 <b>philadelphia</b> 17:22 76:19 295:4 <b>philosophical</b> 240:19 <b>phone</b> 220:24 <b>phonetic</b> 208:3 235:18	<b>photo</b> 65:16 66:2,4,12 68:4 68:11 69:8 <b>photos</b> 210:15 <b>phrase</b> 151:5 174:23 259:24 <b>phrased</b> 64:15 69:11 <b>phrenology</b> 200:15 <b>physical</b> 245:18 <b>physically</b> 7:5 17:20 <b>picking</b> 132:13 <b>picture</b> 74:13 199:24 <b>pictures</b> 210:14 210:19 <b>piece</b> 15:3 46:2 108:9,13,15 141:5 147:11 179:12 287:8 <b>pieces</b> 45:15 53:5,5 108:13 125:8 170:6 197:2,8,12 198:18 211:17 215:15 243:9 267:23 276:7 <b>pile</b> 215:12 <b>piles</b> 215:9,15 215:19 <b>pin</b> 155:7
--	--	---	---

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[pinned - pollock]

Page 49

<b>pinned</b> 10:17	222:2,3 226:21	<b>point</b> 14:21	68:24 72:17
<b>place</b> 11:3 45:4	228:11,12,20	37:23 47:16	73:15,20 74:25
80:14 84:5	228:20 229:8	61:7 160:19	75:16 79:13
158:11 217:23	229:17 230:11	170:18 177:6	81:7 82:12
232:15,17,17	230:12,20	254:11 255:4	88:15,24 90:17
240:18 259:13	231:2,6,8,23	273:22 277:22	91:2 93:23
279:4 291:15	232:5 246:23	279:17	95:8 98:19
295:8	249:8 250:24	<b>pointing</b> 92:17	102:17 103:15
<b>placeholder</b>	251:9 257:6	<b>points</b> 14:8,16	104:7,11
79:5	258:23 269:12	119:9 149:9	106:17,25
<b>places</b> 15:8	<b>platforms</b>	231:11 232:12	111:24 115:17
92:3 103:12	41:18 97:3	277:25	118:18 119:3
210:17 214:2	173:8 193:25	<b>poised</b> 103:5	119:15,24
<b>plaintiff</b> 31:25	196:5 222:14	<b>police</b> 34:11	120:8 121:11
32:18 42:3	222:17 229:6	<b>policy</b> 46:23	122:21 123:25
86:6,9,16,17,20	262:13 263:13	50:7 57:6 99:8	124:24 126:6
<b>plaintiff's</b> 21:6	263:15	<b>politically</b>	128:5 129:3,23
30:24 31:7	<b>platinum</b>	242:6	131:2 132:20
37:4 269:16	198:12	<b>pollock</b> 2:4 3:7	136:19 137:5
<b>plaintiffs</b> 2:7	<b>play</b> 227:10	8:23 9:2 10:12	137:25 141:19
9:5 19:13	239:11 274:13	10:16 17:25	150:12 151:21
<b>plan</b> 12:16	<b>playing</b> 273:21	21:24 22:8	153:19 154:20
53:19 259:3	274:10,15	25:8 26:10	156:2,11 162:9
288:13	277:23	29:19 30:2	164:14 166:11
<b>planned</b> 240:16	<b>plays</b> 289:12	33:21 37:21	167:19 169:21
<b>plans</b> 15:20,25	<b>please</b> 8:21	38:4 41:2,7	170:4 173:9
<b>platform</b> 65:18	9:20 16:17	42:15 43:10	175:7 177:13
81:21 82:9	17:5 75:3 91:4	45:13,20 46:19	177:25 179:2
111:20 112:16	130:12 131:13	47:6 48:7,23	180:9 181:17
169:3,3 170:3	178:13 267:8	49:23 54:6,11	182:6,17 186:2
193:5,19	291:11 294:16	54:16 55:6	186:9 187:7,12
194:19 201:24	296:4,9	56:10 61:10	187:17 189:11
202:22 204:17	<b>pledge</b> 16:11,13	62:10 64:17	190:23 193:6
204:22 216:22	16:13	65:6 68:6,14	195:2 196:15

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[pollock - process]

Page 50

201:25 202:23 217:14 219:12 220:19 221:2 221:16 222:25 223:16 224:21 229:18 233:21 235:16 238:4 244:15 246:16 248:3,15,23 251:23 252:16 252:25 255:5 256:24 257:25 261:13 269:19 271:13 275:3 275:21 277:15 278:10 279:22 281:3 282:7,11 282:15,18 284:7 288:16 291:9,24 293:25 294:5 294:16 <b>poorly</b> 68:18 <b>population</b> 135:23 <b>portrayed</b> 73:4 <b>position</b> 269:3 <b>positive</b> 64:16 148:8,8,12 180:13 <b>positivist</b> 180:14 <b>possession</b> 39:5 39:12	<b>possible</b> 10:19 45:10 244:20 294:15 <b>possibly</b> 68:7 261:17 <b>postulating</b> 193:15 <b>power</b> 13:24 234:17 278:13 279:4 <b>powerpoint</b> 33:14 255:21 <b>pre</b> 65:5 <b>precise</b> 113:19 215:18 <b>precisely</b> 76:13 256:12 <b>predominantly</b> 139:19 <b>preexisting</b> 285:6 <b>preferred</b> 266:7 287:13 <b>prelude</b> 176:24 <b>prepared</b> 206:9 <b>present</b> 7:6 8:18 152:6 <b>presentation</b> 32:19 33:20 34:5 53:8 <b>presentations</b> 99:8 <b>presented</b> 225:12	<b>pretty</b> 49:25 57:21,22 63:24 63:24 <b>preventing</b> 17:7 47:23 <b>prevents</b> 43:8 44:11 46:17 <b>previous</b> 171:4 <b>previously</b> 22:3 26:18 32:17 35:18 36:24 38:14 55:6 107:10 159:20 166:6 213:9 228:21 <b>prices</b> 64:9 242:19 <b>pricing</b> 116:19 230:6 283:20 <b>primarily</b> 99:20 177:2 <b>prime</b> 134:15 134:17,20 146:3,3 <b>principle</b> 189:7 279:13 <b>printed</b> 18:7,9 <b>prior</b> 27:2 55:16,21 83:15 85:12 89:21 90:14 98:23 108:17 227:22 249:6,13 284:5 286:14	<b>prioritized</b> 52:19 <b>priority</b> 198:10 266:7 <b>privileges</b> 252:24 <b>pro</b> 232:23 288:13 <b>probably</b> 14:23 29:3 101:10 134:4 164:21 165:11 198:5 228:7 232:14 263:10 <b>problem</b> 10:11 16:12 82:8 223:23 280:9 <b>process</b> 16:7 21:21 43:22 47:17 49:17 52:13 63:13 64:7 90:13 106:10,14 145:15 161:20 185:21 190:3 191:8,12 201:5 203:24 205:17 214:14 228:18 233:20 234:14 234:19 235:2,4 235:10,12 266:12 274:16 280:3,24,24 281:11,16
--	--	---	---

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[processes - published]

Page 51

<b>processes</b> 136:8 176:6,7 186:24 199:9 201:4 219:17 <b>produce</b> 31:25 32:18 45:11 147:18 <b>produced</b> 23:7 27:2 28:13 31:24 32:17 35:18,25 36:7 36:15,24 38:2 38:14 39:6 48:6 53:3,11 53:15 <b>product</b> 38:22 60:19 114:5 <b>production</b> 6:8 43:8 <b>productivity</b> 246:9 <b>profession</b> 105:6 <b>professional</b> 71:8 <b>professor</b> 96:8 <b>profitable</b> 250:3 <b>profits</b> 117:3 <b>program</b> 99:20 109:17 110:8 110:11 111:8 176:25 198:7 212:17 225:14	266:6 286:7 290:6 <b>programed</b> 240:18 <b>programmers</b> 240:18 <b>programs</b> 117:4 198:9 232:9,10 283:20 284:2,6 284:10,11 285:14 <b>progress</b> 281:2 <b>progression</b> 148:13 <b>project</b> 49:19 50:12 99:5 111:18,23 112:12 206:9 <b>projects</b> 50:8 71:11 157:25 <b>promised</b> 47:25 <b>promotional</b> 293:3 <b>prompt</b> 284:18 <b>prompted</b> 25:6 <b>properly</b> 66:24 <b>proposals</b> 105:21 <b>proposed</b> 185:16 <b>proposes</b> 104:14	<b>propositions</b> 185:24 <b>propounded</b> 298:7 <b>protect</b> 43:12 47:15 49:12 56:12 276:21 <b>protected</b> 42:5 44:3 46:13 <b>protective</b> 45:2 95:17 <b>protocol</b> 133:18 205:21 205:22,24 208:6 <b>protocols</b> 44:20 47:11 207:9 <b>prove</b> 245:18 <b>provide</b> 40:23 57:24 71:23 79:17 119:7 139:17 171:17 238:16,19,20 270:10,17 <b>provided</b> 6:11 34:20 35:4,11 40:24 51:16 52:7 57:5 224:11 <b>provides</b> 122:9 237:16 <b>providing</b> 120:19	<b>provision</b> 221:14 <b>proximity</b> 197:12,22 198:20 <b>proxy</b> 266:18 <b>psychological</b> 130:18 <b>psychology</b> 99:19 109:23 110:2,9 <b>public</b> 1:18 110:5 160:16 181:4 228:6 292:25 295:6 295:19 298:25 <b>publically</b> 32:19 39:11 <b>publication</b> 32:12 <b>publications</b> 28:9 <b>publish</b> 44:18 <b>published</b> 28:13 32:12 42:18 45:15 63:23 107:9 113:25 155:10 196:6,22 224:12 230:23 231:2 286:14 287:7 288:22 289:8 290:12 293:21
---	--	--	---

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[publishes - question]

Page 52

<b>publishes</b> 107:17	<b>put</b> 11:20 15:8 19:2 31:8 33:8 34:23 36:18 53:9 85:13 108:12 117:22 124:8 148:13 158:25 162:22 169:7 188:6 199:3 218:9 233:24 259:13	138:13 141:10 141:16 143:21 144:12,21 145:12,17 146:13,17 147:4,7,19 148:2,6,14 177:2,3,19,23 178:3,9 181:12 181:16 182:4,9 182:15,20,22 183:17,20,23 183:25 184:9 184:12,24 186:12 189:13 190:7,21 191:12,17,17 191:20,22 193:3 199:16 200:25 201:2 229:10,13 263:8 267:18 272:3,24	105:3 106:11 135:5,11,12,16 136:3,4,17 138:12 146:5 146:12,24 147:3,6,19,21 178:2 182:5 189:16 191:13 191:18,25 192:2,18 267:21,23 279:9
<b>puff</b> 125:7	<b>puts</b> 171:4 284:17	188:15,20,22 189:17,20,23 190:25 194:9 194:12,24 196:12 199:13 200:7,21 201:12,17,17 201:20,22 203:3 209:16 204:25 201:2 229:10,13 263:8 267:18 272:3,24	<b>quarterly</b> 64:11
<b>pull</b> 25:12 171:6 173:16 228:5 254:23	<b>putting</b> 132:14 215:14		<b>quest</b> 198:6
<b>pulled</b> 18:13 30:3 290:4	<b>q</b>		<b>question</b> 7:21 16:23,24 17:4 17:5,5,13 26:24 38:17 40:15 46:15 48:9 51:2 56:11,15 58:15 66:8 68:18 69:2,11,20 72:14,19 73:22 79:2 81:17 83:3 88:17 89:9 91:8 106:19 107:5,7 120:2 122:24 122:24 123:4 123:22 128:7 128:22 129:2,5 133:4,9,18
<b>pulling</b> 141:4	<b>qualifications</b> 96:5	<b>qualitatively</b> 267:17	
<b>punishment</b> 67:25	<b>qualified</b> 175:9	<b>quality</b> 125:17 128:10 229:8 285:17 286:7	
<b>punishments</b> 67:7	<b>qualitative</b> 5:6 99:21,22 100:4 100:13,16,21 101:5,9,9,20 102:4,7,9,24 103:4,18 104:4 104:14,15 105:4,11,15,18 105:25 106:8,9 106:14 107:12 108:8 109:10 132:9 135:11 135:18,23 136:3,6,22 137:21 138:5	<b>quantification</b> 267:14	
<b>pure</b> 188:15 208:2		<b>quantitative</b> 101:21 102:10 102:21 103:22 104:2,12,20	
<b>purpose</b> 123:13 174:23 181:12 208:5 246:21			
<b>purposeful</b> 151:5,12			
<b>purposely</b> 276:8			
<b>purposes</b> 11:15 18:21 25:18 27:11 30:16 32:25 59:8 77:15 84:23 92:5 114:14 142:7 156:14 162:18 184:19 203:18 253:12			
<b>pursuant</b> 295:8			
<b>push</b> 103:7 146:7 181:19			

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[question - real]

Page 53

134:7,14,14,19	133:21 143:9	<b>rachel</b> 137:18	<b>rationale</b> 119:7
135:3 140:11	159:19 175:15	<b>racial</b> 200:22	<b>raw</b> 44:2
140:17 141:7	176:15 193:16	200:23	<b>rct</b> 135:15
141:21 151:23	195:11 203:2	<b>racially</b> 65:25	<b>reach</b> 201:23
154:22 162:11	206:6 217:11	66:6,12	<b>reached</b> 204:12
165:12,18	227:9,10 240:4	<b>radar</b> 197:3	<b>reaction</b> 83:19
168:20 173:18	257:3 268:24	<b>raise</b> 17:5	<b>reactivation</b>
175:5,10	273:10 282:3	<b>raised</b> 39:22	253:23
176:22,23	291:8 292:3,3	119:9	<b>read</b> 22:12,25
179:10,21	294:2 298:7	<b>raises</b> 131:9	23:9,15 31:15
182:19 186:17	<b>queued</b> 234:23	<b>raising</b> 259:7	42:22 52:7
186:20 191:24	<b>quickly</b> 85:4	<b>random</b> 135:4	77:19 92:16
193:8,22,25	196:5	135:15,15	115:11 118:11
195:9 203:14	<b>quintessential</b>	190:16 254:18	129:19 152:12
206:18,20	283:6	<b>ranked</b> 190:17	170:13 174:2
220:12 223:19	<b>quite</b> 58:15	<b>rapidly</b> 181:25	176:21 186:3
227:4 231:25	80:12 104:8	<b>rate</b> 76:5	187:9 189:6,23
234:5 235:18	109:8 128:8	224:14 237:21	195:21 227:17
244:17 246:12	130:11 133:17	237:23 238:3,7	227:22 237:12
252:3 253:16	133:20,20	238:8,10,14	242:16 244:2
255:7,14,16,17	141:21 159:13	246:4	260:11 265:18
258:10 261:15	159:15 160:11	<b>rates</b> 224:9	285:3 289:13
267:6 272:23	169:14 202:8	231:15	293:22 296:4
272:25 273:15	208:3 271:14	<b>rather</b> 16:8	298:4
275:5,22 277:3	278:12	31:13 65:4	<b>reading</b> 51:11
279:24 280:9	<b>quote</b> 254:2,12	187:3,9 234:8	60:22 116:11
280:11,13	<b>r</b>	234:8	125:6 130:5
284:18 286:10	<b>r</b> 2:2,16 79:4	<b>rating</b> 116:19	197:25 198:21
287:4 292:14	295:2 297:3,3	198:2,2 215:8	198:22 206:16
<b>questions</b> 6:17	<b>r1</b> 143:2	224:10 225:7	214:15 215:6
16:20 31:10,16	<b>rabbit</b> 212:3	266:4 276:5	272:10
69:25 76:10	<b>race</b> 108:4	290:10,14	<b>ready</b> 84:14,15
85:11 90:20	200:18 242:18	<b>ratings</b> 225:9,9	<b>real</b> 193:7
117:18 130:14		253:19	271:12



## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[realize - regulation]

Page 54

<b>realize</b> 73:3 155:22	<b>reasons</b> 44:25 49:2,11 103:8 163:9	<b>recognition</b> 101:3	<b>reference</b> 38:15 51:19 65:21 177:9
<b>realized</b> 15:14		<b>recognize</b> 156:25	<b>referenced</b> 23:5 79:3 228:7
<b>really</b> 15:16 52:5 69:2,4 73:6 80:20 83:5 87:23 88:3 92:5 109:14 126:8 129:20 134:15 150:22 151:23 155:20 160:21 160:25 166:14 191:10 195:4 196:24 201:11 201:12 229:5 235:8 239:19 246:18 247:8 257:2 260:7 263:9 271:6 273:8 286:15 290:7 293:7	<b>rebuttal</b> 3:13 13:13 15:6 24:19,23 25:3 117:24 118:12 118:17,24 119:2,5 120:12 120:17 121:4 124:7 149:9 158:21	<b>recognized</b> 192:18	<b>references</b> 33:24 34:3 43:5
<b>realm</b> 62:13 79:15	<b>rebutting</b> 118:3	<b>recommend</b> 150:25	<b>referencing</b> 78:13
<b>realtime</b> 256:9 288:13	<b>recall</b> 57:10,18 171:8 222:8 228:3 292:14	<b>recommended</b> 58:6	<b>referred</b> 201:6 249:7 250:11
<b>reason</b> 47:23 58:19 73:9 75:23 120:15 133:8,24 296:6 297:7,10,13,16 297:19,22	<b>receipt</b> 296:16	<b>record</b> 7:17 8:5 8:21 9:21 10:21,24 11:7 45:8 83:14 84:3,9 87:3 91:3 158:9,15 217:21 218:3 245:18 291:10 291:13,19 294:9 295:12	<b>referring</b> 39:15 39:20 49:16 66:2 131:22 149:13 167:14 170:25
<b>reasoning</b> 119:7	<b>receive</b> 37:13	<b>recorded</b> 8:8 295:10	<b>refers</b> 50:23 52:24
	<b>received</b> 27:17 28:24 33:7 51:17,23 52:17 84:17 124:15 124:16 214:4 227:13	<b>recordings</b> 41:15 50:19 52:23 268:18	<b>refined</b> 113:12 113:16
	<b>receives</b> 103:8	<b>records</b> 35:19 35:19,20 36:13 36:13 52:24 181:4	<b>reflect</b> 196:7 242:4
	<b>recent</b> 72:12	<b>recourse</b> 81:21	<b>reflected</b> 20:8
	<b>recently</b> 15:13	<b>refer</b> 9:23 51:18 165:23 216:15 228:11 249:18 258:19	<b>reflects</b> 19:20
	<b>recess</b> 11:3 84:5 158:11 217:23 291:15		<b>reflexus</b> 192:6
	<b>reciprocity</b> 150:21		<b>refund</b> 261:24
	<b>reciting</b> 154:11		<b>region</b> 1:21
			<b>registered</b> 65:18
			<b>registrations</b> 237:17
			<b>regulation</b> 115:5

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[regulations - reporter]

Page 55

<b>regulations</b> 245:19	60:19,21,21 80:21 102:3	<b>replacement</b> 136:6	122:6,19,19 123:3,7,11,13
<b>relate</b> 213:16 231:19	106:3 108:14 110:10 146:20	<b>replicable</b> 148:10	123:20 124:13 125:5,12,19
<b>related</b> 15:7 23:16 41:16,19 76:15 82:9,11 90:20 134:17 202:7 233:20	151:4 153:14 158:23 169:5 180:12 194:6 206:4 222:10 227:21 251:2,6 265:20 274:17 288:24,25	<b>replicated</b> 145:15	127:4,8 130:25 131:5,17 132:14 137:23 149:8 152:17 152:19,21 153:8,24 154:3 154:4,12 155:6 158:21,25 159:5 160:8 161:5,6 162:2 162:23 163:8 169:7 176:14 197:25 199:3 213:14 216:13 216:14 218:9 222:6 226:25 228:6 229:15 232:18,20 233:15 236:19 239:2,10,21 253:12 254:7 266:21 285:6 285:10 286:17 286:25 289:7 292:6
<b>relates</b> 128:21 230:23	<b>remembering</b> 81:9 238:15	<b>report</b> 3:13 5:3 11:11 12:7,13 12:17 13:14,20 14:11,16,18,22 15:18,20 18:7 20:4 23:5,19 23:21 24:8,10 24:15,18,19,23 24:23 25:3 28:15,25 33:25 35:6,11 38:16 38:20 39:9,11 39:17,25 40:9 42:10,11 43:3 51:11 53:6,11 53:21 55:14 78:5 82:9 85:16 89:7,18 89:21 90:3 91:8,12,25 93:5 96:4 105:13 117:22 118:12,17,17 118:24,25 119:2,5,12,20 119:22,23 120:7,14,16 121:3,5,15	<b>reported</b> 254:20
<b>relations</b> 13:22	<b>remind</b> 187:7 203:21		<b>reporter</b> 8:16 8:21 16:10 294:10
<b>relationship</b> 202:11 221:11	<b>reminding</b> 187:18		
<b>relevant</b> 100:12 152:16 162:6	<b>remote</b> 1:12 26:2 30:25 221:11 263:20		
<b>reliability</b> 146:15,16,23 147:5,16	<b>remotely</b> 1:15 7:8,12 8:19		
<b>reliance</b> 207:17	<b>renders</b> 240:19		
<b>relied</b> 38:24 39:7,21,23 290:7	<b>rep</b> 223:22		
<b>relies</b> 208:3	<b>repairs</b> 71:10		
<b>rely</b> 42:11,17 285:11	<b>repeating</b> 152:8		
<b>relying</b> 34:17 92:22 96:25 227:15 284:4 285:21 286:13 286:23 287:6	<b>repeats</b> 31:12 <b>repetition</b> 204:9		
<b>remember</b> 22:20 40:13,15 52:5 60:5,18	<b>rephrase</b> 17:6 173:12 <b>replaced</b> 64:4 136:5		

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[reporter's - research]

Page 56

<b>reporter's</b> 16:18	52:21	126:13,16,17	191:17,19,20
<b>reporting</b> 7:7	<b>requestion</b> 184:11	126:20,23,24	191:22,25
7:14 255:25	<b>requests</b> 26:17	127:14,15,22	192:2,7 193:4
<b>reports</b> 32:8	27:16 31:12	127:25 128:4	193:16,21,25
38:10,19 54:3	<b>required</b>	129:13,17	195:11,23
89:21 90:15,15	113:23 224:20	132:11 133:8	196:14,17
127:16 128:9	269:17	133:18 134:6	197:20,24
129:25 154:10	<b>requires</b>	134:19 135:5	199:6 200:25
179:22 214:18	175:10	135:16,18	201:2 202:16
<b>represent</b> 31:6	<b>reread</b> 15:13	136:3,4,7,23,24	202:18,25
31:11 121:13	<b>research</b> 4:18	137:2 138:5,16	203:2,13,13,18
<b>representative</b>	5:7 34:8 42:14	139:7,8,13,18	205:7 206:18
135:13 145:10	42:18 43:13,22	139:20 140:11	208:10,17
199:15,18,23	45:16 46:2	140:17 141:5,9	209:13,14,18
225:19 255:14	47:8,10,17,24	141:10,16	209:19 210:23
<b>representatives</b>	48:16 49:14	142:21 143:13	211:13,22
228:3	58:22 63:12	143:16 144:21	212:16 214:3
<b>representing</b>	67:21 70:10	145:17 146:5	219:15 224:12
2:7,12 8:15 9:5	76:16 77:5,19	146:17,24	225:17 226:11
<b>represents</b>	80:20 81:25	147:3,4,7,22	226:18 227:9
185:21 186:7	82:3 83:4	148:2,6,14,24	229:9 231:11
<b>reprimanded</b>	92:10,10 98:24	149:6 152:12	243:14,17,19
80:15	99:5,18,20	165:10 167:10	250:10,14
<b>reproducibility</b>	100:4,9,23	168:12 176:25	252:10 255:16
147:25	102:7,9,10,21	178:10 179:6	263:8 264:9,22
<b>reputable</b>	102:24 103:5	179:20,22	264:24 267:18
190:19	103:18,22	181:13,16	267:21 272:4
<b>request</b> 6:8	104:2,4 105:21	182:4,10,15,20	272:10,24
17:12 31:18	105:25 106:8,9	182:22 183:3	273:6 284:5
32:6,7,17 35:2	106:11 109:10	183:20,23,25	285:8,12
35:17 36:23	112:3 122:9	184:24 186:12	286:21 287:10
37:9 38:14	124:18,20	189:16,24	287:19 288:3
42:4 51:8	125:17 126:4	190:7,18,21	288:15 289:9
		191:4,8,12,14	289:15 290:25

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[researcher - rides]

Page 57

<b>researcher</b> 74:3 190:22 195:24 196:7 <b>researcher's</b> 72:20 <b>researchers</b> 13:25 14:3,17 45:25 101:10 101:12 105:18 149:4 168:21 227:2 289:19 <b>researching</b> 41:18 <b>resentment</b> 270:9 <b>reserved</b> 7:21 <b>resistance</b> 270:9 <b>resources</b> 71:9 <b>respect</b> 211:23 236:12 <b>respective</b> 7:19 <b>respond</b> 94:24 118:10 144:12 181:6 223:22 223:22 <b>responding</b> 118:10 119:13 121:17,19 <b>response</b> 27:15 31:23 32:15 37:8,9,13 39:3 42:2 43:5 50:23 75:17	82:20 122:25 123:9 <b>responses</b> 4:3 26:21 30:24 31:8 41:15 <b>responsible</b> 222:23 223:4 223:10,13 <b>responsive</b> 32:16 38:13 39:4 51:8 119:21 <b>rest</b> 106:6 120:16 121:15 122:19 285:6 <b>restricted</b> 222:13 <b>result</b> 68:11 274:5 <b>resulting</b> 115:4 <b>results</b> 125:16 147:18 256:10 259:9 <b>resume</b> 26:25 31:20 <b>retain</b> 56:15 <b>retained</b> 21:2,4 54:19,25 55:25 56:7 57:23,25 86:5 <b>retainer</b> 19:15 36:4 84:18 <b>retention</b> 36:25 37:14,16 56:12	<b>return</b> 296:14 <b>returning</b> 34:24 277:8 <b>reuse</b> 90:14 91:15 <b>reused</b> 90:18 <b>revenue</b> 258:9 <b>review</b> 28:4 29:8 42:6 43:6 43:8,25 44:6 46:14,17,24 47:11 49:18 50:13 52:8 97:24 106:10 108:10 143:5 211:17 293:21 <b>reviewed</b> 28:8 40:5,16 47:13 63:23 82:3 92:23 124:20 127:25 136:23 138:19 222:5,9 250:15 253:7 <b>reviewer</b> 267:22 <b>reviewers</b> 46:6 <b>reviewing</b> 214:8 <b>reviews</b> 107:10 <b>revise</b> 206:23 207:3 <b>revision</b> 143:3 <b>revisitation</b> 290:18	<b>revoke</b> 252:24 <b>rewards</b> 284:11 <b>ride</b> 41:20 58:22 61:4,8 71:7 76:18 78:16 79:3,6 80:13,17 91:19 92:10,14 94:13 94:17 97:3,8 107:18 115:3,6 115:8 116:3,24 117:4,11 121:25 132:3 138:22 139:2 145:20 149:16 151:19 153:12 153:17 154:18 155:4,8 156:8 157:14 160:17 178:21 192:22 210:7 211:23 231:12,13,14 249:24 250:3 260:22 <b>ridehailing</b> 33:16 <b>riders</b> 112:19 112:22,25 221:15 224:16 247:25 248:9 248:22 262:6 <b>rides</b> 150:5 167:22 168:16 198:4 205:9,10
---	---	---	--

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[rides - safeguards]

Page 58

210:16 225:5	93:17 96:3,15	245:13,23	220:12 289:12
225:13 231:14	97:17 98:6,25	246:2,6 247:12	<b>room</b> 7:6 18:4
257:6 279:16	101:22 104:5	247:20 248:10	259:2
<b>rideshare</b> 8:10	108:22 113:21	249:14,22	<b>rothman</b>
<b>ridesharing</b>	114:24 117:25	250:8,12,18,21	244:18 265:19
41:18 72:16	121:9 124:10	251:19 253:19	287:18 290:13
115:14 149:17	130:22 139:15	253:23 254:23	<b>rough</b> 294:12
150:5 151:20	139:23 140:18	255:12 257:18	294:15
153:12 154:10	140:20,21	262:23 270:5	<b>roughly</b> 24:3
154:18 155:4,7	142:17 144:4,9	270:12,21	55:2
155:10 156:8	146:21 147:22	278:15 279:11	<b>round</b> 29:8
157:5,14,22	153:3 156:17	283:7,21 284:2	54:7 83:6
<b>riding</b> 178:21	158:5 159:14	287:8 291:9	215:10
222:17	159:17 161:11	292:9,16	<b>route</b> 261:19,20
<b>right</b> 11:22	168:8 170:18	293:24	<b>routes</b> 260:23
12:5 13:5,7	173:22,22	<b>rights</b> 43:13	261:8,12 262:3
15:17 16:4	178:17 179:24	<b>rigor</b> 113:23	262:10
17:10,25 18:16	185:18 187:11	125:3 132:11	<b>row</b> 167:23
19:10 24:20	193:15 194:10	148:24 149:5	168:17
30:9 31:21	194:15,20	160:4 255:19	<b>rpr</b> 1:17 295:6
32:2 33:17	199:20,25	<b>rigorous</b> 46:3	295:18
35:25 36:5	200:14 201:7	106:2 125:10	<b>rules</b> 245:19
40:19 46:5	204:14 209:21	125:24 126:19	267:2
51:21,22 53:21	211:8,18,24	131:17 132:15	<b>run</b> 184:10
53:23 55:3,4	212:10,14,25	202:16,18	259:4 260:3
55:11,18 56:18	213:10 214:10	226:22 227:4	<b>running</b> 258:20
63:14,19,25	226:15 227:16	<b>rigorously</b>	<b>runs</b> 241:9
69:19 70:13	228:9,12,16,21	230:18	<b>s</b>
71:4,11,15	228:25 231:22	<b>robin</b> 260:9	<b>s</b> 2:2,16,16 3:9
74:22 75:12,18	232:19 233:6	<b>robo</b> 221:10	<b>s1s</b> 293:2
76:7 77:7 79:8	234:7 235:6	<b>roladex</b> 81:10	<b>safe</b> 44:21
79:11 80:16	236:6 237:5	<b>role</b> 88:5 98:8	<b>safeguards</b>
82:3 84:12,16	238:23 239:5	99:3 108:18	45:3
85:21 90:11	241:24 243:24	109:3 110:14	

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[safety - second]

Page 59

<b>safety</b> 68:5,8,11 82:9,11 116:23 198:14 251:10 251:14 252:13 <b>sake</b> 181:22 <b>salary</b> 237:21 <b>sales</b> 267:7 <b>salis</b> 137:17 <b>sample</b> 135:13 135:23 199:15 199:18 201:13 201:19 254:18 255:15 <b>sampled</b> 133:7 133:24,25 <b>samples</b> 201:10 <b>sampling</b> 134:3 134:24 135:4 135:10,20 199:19,22 <b>samplings</b> 206:14 <b>san</b> 1:4 8:13 <b>sanctioned</b> 67:5,12 <b>satisfaction</b> 288:19 <b>satisfied</b> 109:16 <b>saturation</b> 203:19,22,23 204:13 <b>saval's</b> 60:2 <b>save</b> 76:13	<b>saw</b> 24:14 79:2 131:25 132:3 145:2 154:2 155:6 169:24 255:22 <b>saying</b> 14:16 28:11 46:8 64:23 68:3 78:7,21 80:4,5 86:16 100:20 103:14,16 122:2,13 123:19 144:20 160:9 172:19 180:8 215:22 219:3 257:16 258:11 280:22 287:4 <b>says</b> 24:22,23 26:24 36:24 37:8 38:12 41:13 46:25 49:21 51:18 60:24 63:11 66:8 71:20 76:12 91:17 95:16 97:9 98:3,22 99:17 102:4 131:24 140:21 143:16 143:25 144:16 144:23 161:18 174:5 185:10 185:11,16	186:22 191:3 194:17 220:2 234:14 242:25 244:3 254:5 266:14 268:10 268:19 284:9 <b>says.r1</b> 142:25 <b>scammed</b> 80:11 <b>scan</b> 26:16 <b>scanning</b> 26:13 <b>scattered</b> 53:4 <b>schedule</b> 72:6 72:22 73:3,8 74:20 75:13 160:22 171:23 222:20 257:4 271:3 <b>schedules</b> 174:8 <b>scheduling</b> 71:22 72:15 171:16 172:8 172:15,18 <b>scholar</b> 99:18 <b>scholars</b> 161:13 162:5 219:5 236:2,5 244:3 244:12 <b>school</b> 96:8 109:18 <b>school's</b> 98:4 <b>schools</b> 219:21 <b>science</b> 64:11 105:20,22	108:21 110:20 <b>sciences</b> 44:8 <b>scientific</b> 226:22 227:4 293:15 <b>scoot</b> 12:4 212:5 253:15 <b>scope</b> 69:7 <b>score</b> 276:6 <b>scores</b> 234:9 <b>scoring</b> 273:22 <b>scrapping</b> 293:3 <b>scratch</b> 20:14 44:12 50:6 173:17 271:10 <b>screen</b> 11:21 19:2,4 25:23 30:21 33:8 59:15 124:9 142:11,14 157:2 159:2 162:22 210:14 292:7 <b>script</b> 206:24 <b>scripted</b> 65:5 <b>scripts</b> 267:2 <b>scroll</b> 27:24 63:5,6 163:3 <b>scrolling</b> 63:6 <b>seal</b> 295:14 <b>seattle</b> 237:24 <b>second</b> 10:8 13:9 14:13,15 19:15,21 29:8
--	---	--	--

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[second - sent]

Page 60

29:13 58:24	<b>security</b> 44:20	177:6,9 182:12	250:14 262:7
91:9 109:2	<b>see</b> 10:6,9 19:3	184:13 185:2	263:22 279:14
111:15 114:11	19:5,17 25:23	185:14 186:16	282:11
114:18 122:5	26:4 27:4 28:7	187:13 188:10	<b>sees</b> 187:20
139:12 141:25	29:10 30:20	190:9 192:4,11	<b>selective</b> 14:25
143:9 170:19	31:21 32:13,20	194:3 195:25	<b>selling</b> 265:24
173:18 174:4	33:9 35:8,22	196:9 199:10	<b>semi</b> 41:17
182:13 183:7	37:6,8,10	204:18 210:10	42:12 132:24
184:16 204:15	39:13 41:8,24	213:18 218:14	133:3 177:17
234:10 240:17	42:7 50:14,21	218:21 219:6	<b>seminar</b> 32:9
277:9 292:10	57:8 59:16	220:3,8 223:12	<b>semistructured</b>
<b>section</b> 63:7	61:5 63:9 66:7	223:24 231:17	205:12,18
70:4 77:21,22	66:22 67:13	231:22 232:2	207:4,20
120:25 122:4,8	70:3,7 71:15	234:13 236:20	208:11,18
122:8,12,18	72:2,3,9 74:17	239:2,10 241:3	211:3 212:24
131:23 161:16	76:21 78:10,18	242:8 243:20	272:16
171:8,9,12	78:24 86:4	247:16 248:4	<b>senate</b> 57:6
176:18 191:2	92:19 94:9	256:14 262:18	58:10
192:7,13 212:6	99:25 100:10	263:25 268:7	<b>senator</b> 60:2
212:7 213:14	101:2 103:11	268:22 274:6	<b>sense</b> 21:15
218:11,11	108:6 120:25	283:2 284:19	24:17 51:3
233:2 239:22	121:19 122:3,7	290:15 292:7	58:17 62:17
239:23,24	122:11 123:10	293:10	105:5 135:21
240:10 264:2	124:5 126:25	<b>seeing</b> 215:19	174:20 212:9
268:4 270:2	131:19 139:14	<b>seeks</b> 42:4	248:12 264:8
282:6,22	140:15 142:13	<b>seem</b> 151:6	264:20 270:10
283:15 284:19	143:10,11,23	229:24 230:11	270:14,19,23
285:4,9 286:5	144:8 149:18	230:16	271:2,8,11,20
286:17,25	150:18 153:7	<b>seems</b> 51:9	272:2
288:5 290:16	154:3 157:4,11	<b>seen</b> 15:15 26:6	<b>sensemaking</b>
<b>sections</b> 216:13	159:6 160:8	26:18,19 31:3	203:9
283:5 286:11	163:14 166:3	128:8 162:25	<b>sensors</b> 245:17
<b>secure</b> 68:12	169:16 170:6	223:14,20	<b>sent</b> 19:13,15
71:25 171:18	171:20 174:10	224:4,7 242:5	19:25 21:9

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[sent - similar]

Page 61

36:3 54:7 <b>sentence</b> 64:14 67:9 91:17 116:4 127:19 141:5 144:23 144:24 164:10 165:6,17 167:4 170:12,13,16 170:19 171:3,4 212:2 218:21 263:6 270:7 284:9 292:11 292:12,19 <b>sentences</b> 186:4 <b>separate</b> 19:18 53:8 <b>september</b> 211:11 <b>seriously</b> 199:6 <b>served</b> 11:25 110:12 <b>serves</b> 68:5 174:22 186:23 <b>service</b> 68:5 94:2 221:18 230:17 266:24 267:2 268:11 268:12,17 <b>services</b> 71:10 157:5 221:14 260:10 <b>set</b> 14:3,3 31:12 36:14 46:7 147:18 176:6	181:8 224:16 242:19 271:16 286:8 <b>sets</b> 181:23 224:14,18 <b>setting</b> 64:9 178:21 179:7 266:19 267:5 267:13 <b>settings</b> 83:8 140:15,18 <b>settled</b> 95:23 <b>setup</b> 213:19 <b>seven</b> 114:3 145:3 181:3 207:3 292:24 <b>several</b> 72:4 115:3 139:16 153:11 244:19 245:11 <b>severe</b> 252:13 <b>sexual</b> 1:7 252:22 <b>shape</b> 24:10 108:5 268:10 <b>shaped</b> 40:12 <b>shapes</b> 42:24 <b>share</b> 11:20 13:4 25:15 46:25 49:22 70:10 85:3 <b>shared</b> 34:6 43:23 44:2 60:19 180:5	209:23 <b>sharing</b> 44:12 150:16,19 151:13 155:21 155:24 262:17 <b>sharper</b> 206:17 206:17 <b>sheer</b> 208:14 <b>sheet</b> 296:7,10 296:12,15 298:9 <b>shelf</b> 221:9 <b>sherman</b> 137:18 <b>shift</b> 170:22 172:19,21 228:14 <b>shifting</b> 54:18 117:21 <b>shipt</b> 86:13 94:14,15,22 95:5 <b>shopper</b> 265:22 <b>shortcut</b> 161:9 <b>shorter</b> 17:17 <b>shorthand</b> 295:10 <b>shortly</b> 107:24 243:6 <b>shots</b> 210:15 <b>show</b> 126:15 152:18 155:25 173:16 184:15 192:16 210:19	281:20 <b>showed</b> 36:11 226:6 <b>showing</b> 190:3 <b>shown</b> 126:12 173:15 <b>shows</b> 149:5 231:11 <b>shred</b> 93:4,19 <b>shredded</b> 93:13 <b>shutdown</b> 132:2 <b>side</b> 86:8,9,12 86:17 118:9 165:24 170:6,6 <b>siege</b> 94:5 <b>sign</b> 43:19 166:19,20,23 204:12 222:3 250:2 289:13 296:9 <b>signals</b> 139:9 <b>signature</b> 12:5 295:18 298:12 <b>signed</b> 50:2 <b>significance</b> 200:5,9 <b>significant</b> 163:10 166:9 231:14 270:11 <b>signing</b> 296:11 <b>silence</b> 240:8 <b>similar</b> 57:22 90:20 92:13,13
--	--	--	---



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[similar - sort]

Page 62

92:14 126:5 137:20 159:19 180:18 209:20 213:23 214:2 215:25 222:14 268:24 <b>similarly</b> 224:15 226:7 <b>simmons</b> 2:3 9:3 54:23 <b>simmonsfinal</b> 3:16 <b>simmonsfirm...</b> 2:6 <b>simple</b> 54:12 219:4 <b>single</b> 19:19 127:23 <b>sir</b> 12:10 93:22 <b>sit</b> 105:19 116:15 235:7 259:2 <b>site</b> 13:17 <b>sites</b> 139:8 140:9 <b>situation</b> 196:2 196:4,8,25 200:6 206:11 <b>situations</b> 55:9 66:16 67:3 237:25 <b>six</b> 85:19 101:7 105:15,23 106:4 114:3	145:2 148:25 181:2 259:4 <b>size</b> 201:19 <b>skeptical</b> 73:14 <b>skills</b> 110:20,22 <b>skim</b> 215:2 <b>skimmed</b> 40:25 41:3 52:4 227:12 <b>skimming</b> 267:25 <b>skinned</b> 66:10 <b>skip</b> 175:16 182:12 273:18 <b>skipping</b> 240:3 268:3 273:16 <b>slightly</b> 40:21 40:21 54:19 108:16 278:23 <b>slippage</b> 160:23 160:25 <b>slipped</b> 38:6 <b>slow</b> 228:19 <b>small</b> 104:21 105:13 197:15 197:19 <b>smaller</b> 215:14 215:14 263:18 <b>smart</b> 109:14 220:24 <b>smell</b> 34:12 82:10 <b>smells</b> 34:10,11 78:7 79:18	<b>social</b> 4:20 148:16 150:20 173:20 178:8 199:8 229:6 236:21 241:21 242:5,10 <b>socialist</b> 104:19 <b>socially</b> 149:6 242:6 <b>societal</b> 76:4 <b>societies</b> 70:18 <b>society</b> 70:12 74:12 98:5,24 <b>sociological</b> 130:17 <b>sociology</b> 97:16 97:23,23,24 99:19 109:24 110:5 <b>solely</b> 244:9 <b>solid</b> 127:3 <b>solidness</b> 127:7 127:21 <b>solutions</b> 1:21 <b>somebody</b> 60:4 147:17 148:12 226:2 265:11 <b>someone's</b> 49:5 293:17 <b>somewhat</b> 215:25 <b>soon</b> 294:14 <b>sophistication</b> 154:12	<b>sorry</b> 20:14 41:11 85:8 97:12 114:7 125:22 130:10 130:12 149:22 154:23 157:18 172:16 183:6 271:9 280:15 294:15 <b>sort</b> 10:22 14:8 21:20 43:20 44:7 46:23 52:16 53:7 89:6 92:14 119:5 120:14 121:21 126:11 126:12 127:2 130:6 132:9 137:3 149:4 150:20 151:6 153:10 174:23 183:16 188:21 192:5,14,15,25 198:7 201:10 214:3 215:2 220:11 223:23 225:22 230:17 233:13 242:15 255:18 265:20 269:2 276:23 277:24,24 279:15 285:5 286:3
---	---	--	---

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[sought - stipulation]

Page 63

<b>sought</b> 58:18	288:15	<b>stamp</b> 33:6	<b>statement</b> 3:23
<b>sounds</b> 55:4	<b>specifically</b>	<b>stance</b> 178:8,12	50:8 62:16
59:24 60:6	23:16 42:3	<b>stand</b> 123:20	68:2 115:23
83:24 88:6	78:13,19	153:16 197:6	139:25 141:9
163:22 194:22	101:14 119:14	197:18	145:6 241:10
215:25 217:16	129:14 144:11	<b>standalone</b>	286:16
281:10	176:21 226:13	119:12,17	<b>statements</b>
<b>source</b> 13:23	230:24 239:10	122:20 123:5	50:16 51:5
190:19 262:5	245:5 272:18	<b>standard</b> 128:3	172:4
276:10	287:8	128:15 146:11	<b>states</b> 1:2 8:11
<b>sources</b> 133:11	<b>specifics</b> 124:6	146:12,13	113:2,8 153:11
133:19 147:13	260:17	<b>standards</b>	243:2
192:21,22,25	<b>spectrum</b> 176:3	99:22 177:3	<b>stating</b> 62:2
<b>space</b> 16:19	176:4	<b>standing</b> 122:7	<b>statistical</b> 14:5
77:10 296:7	<b>speculate</b> 82:14	<b>standpoint</b>	200:4,9
<b>spans</b> 20:13,16	<b>speed</b> 225:4	180:16	<b>statistics</b>
<b>speak</b> 44:24	277:3	<b>start</b> 26:20,22	200:13
86:24 120:22	<b>speeds</b> 246:5	39:23 109:8	<b>status</b> 108:4
121:8 122:10	<b>spell</b> 107:20	116:11 121:2	175:11
138:6	<b>spends</b> 277:12	131:15 185:22	<b>stay</b> 248:24
<b>speaking</b> 88:11	<b>spent</b> 20:21	186:12 215:6,9	<b>stayed</b> 207:15
92:18 111:18	23:19	265:10 276:13	<b>staying</b> 256:10
237:6	<b>split</b> 188:6,7,17	294:10	<b>steeped</b> 86:20
<b>speaks</b> 120:16	<b>spoke</b> 152:10	<b>started</b> 20:10	<b>stenographer</b>
<b>specific</b> 12:22	152:11	40:2	7:5
42:25 49:9,20	<b>spoken</b> 225:18	<b>starting</b> 52:18	<b>stenographic</b>
50:8 88:7	<b>spreadsheets</b>	215:14 283:23	7:17
89:25 100:23	215:21	285:18	<b>step</b> 202:5
113:15 116:8	<b>sprouts</b> 271:19	<b>starts</b> 124:7	274:24
134:5 141:17	<b>stage</b> 140:24	149:15 264:2	<b>steps</b> 292:17
183:23 196:19	<b>stages</b> 228:11	<b>state</b> 8:19 9:20	<b>sticks</b> 274:20
208:7 239:18	<b>stakeholders</b>	57:6 58:10	<b>stipulated</b> 7:18
242:2 280:4,25	174:6	100:13 175:19	<b>stipulation</b>
281:4,21 287:2		295:6 296:6	7:16 37:23

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[stipulations - supplement]

Page 64

<b>stipulations</b> 6:13	132:17,23,24 133:3 177:17	57:2 95:11,17 170:23 191:4 279:21 296:11	<b>suggesting</b> 220:10
<b>stop</b> 158:5 204:13 219:3	<b>structures</b> 199:9	<b>subjective</b> 177:24 178:3	<b>suggestions</b> 266:23
<b>stopped</b> 113:7	<b>student</b> 109:25	<b>subjectivity</b> 178:13	<b>suing</b> 86:12
<b>store</b> 265:23	<b>students</b> 127:23 226:8	<b>subjects</b> 43:13 47:15 49:13	<b>suitable</b> 144:2
<b>stories</b> 83:20	<b>studied</b> 23:10 77:11 212:3	<b>submit</b> 20:3 47:9	<b>suited</b> 103:19
<b>strange</b> 256:11	230:18 231:8 262:24 267:17	<b>submitted</b> 60:14	<b>summary</b> 34:21 87:12 120:11
<b>strategies</b> 219:6	<b>studies</b> 32:8 44:5 47:24	<b>subscribed</b> 298:15	120:12,15,21 121:4 122:14
<b>strategy</b> 186:24 221:20 258:23	48:16 53:16 100:8 108:17	<b>subsections</b> 283:5	124:7 131:9 149:9 158:21
259:2,10 260:3 260:19	126:18 173:15 174:5 192:21	<b>subsequent</b> 28:12 90:15	177:10 292:12
<b>strauss</b> 183:11 183:13 185:17	263:23 <b>study</b> 13:11	<b>subset</b> 66:13	<b>summer</b> 22:2,9 22:15,17,21
188:7,8,16,16	43:19 47:9 77:9 102:3,25	<b>subsidized</b> 268:20	23:2,15 131:24 132:6 154:9
<b>street</b> 2:5 133:16	109:23 140:5 140:21,23	<b>substance</b> 298:8	211:5
<b>stressing</b> 234:17	144:2 195:5,15 200:16 226:19	<b>substantially</b> 12:20	<b>summertime</b> 21:25
<b>strike</b> 172:17 210:20	264:22 <b>study's</b> 139:17	<b>substantiate</b> 79:11	<b>super</b> 51:23 54:11 88:6
<b>strikes</b> 210:19	<b>studying</b> 152:14 201:14	<b>success</b> 244:7	<b>superficial</b> 149:25 150:8
<b>strong</b> 262:2	286:18	<b>sufficient</b> 202:20 252:23	151:18 152:2,9 152:20 153:17
<b>stronger</b> 191:8	<b>stuff</b> 93:20 212:18	<b>suggest</b> 282:2	153:23 160:15
<b>structural</b> 73:2 74:4,6,16 75:7	<b>subject</b> 32:16 38:12 56:25	<b>suggested</b> 261:20	<b>superficially</b> 270:10
75:11 108:25 178:20 199:5			<b>supervision</b> 295:11
<b>structure</b> 132:22			<b>supplement</b> 15:20 72:5
<b>structured</b> 41:17 42:12			

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[supplemental - talk]

Page 65

<b>supplemental</b> 12:19	229:13 238:6 245:7 251:25	<b>sworn</b> 9:12 10:3 295:9 298:15	<b>tables</b> 138:8 <b>tacking</b> 272:13 <b>tactics</b> 164:23 164:24
<b>support</b> 4:20 6:2 14:20,21 92:24 99:6 173:20	255:15 258:2 267:20,23,24 278:14	<b>system</b> 66:21 69:17 106:7 165:2 167:12 215:8 223:15 224:13 225:10 225:25 241:9 243:2 249:21 253:19 261:17 266:22 276:4,5 276:8 277:20 278:2 281:24 283:11,17 290:10,14	<b>take</b> 13:6 17:14 17:16 30:10 31:7 51:4 107:15 110:2 111:2 117:20 132:17 136:16 146:22 156:9 156:21 158:6 160:19 178:19 202:5 212:8 217:12 241:25 241:25 257:12 261:11 262:3 293:13,20
<b>supporting</b> 127:19	<b>surface</b> 159:16 159:23 160:2	<b>systems</b> 4:18 65:25 66:3,5 67:20 96:21,23 104:19 136:7 142:21 143:13 143:18 225:7 226:20 242:4 243:8 245:13 277:18	<b>takeaways</b> 143:12
<b>supports</b> 14:18	<b>surge</b> 230:6		<b>taken</b> 1:15 8:9 50:16 140:4 190:15 295:7
<b>suppose</b> 178:19	<b>surges</b> 259:7		<b>takes</b> 156:22
<b>supposed</b> 123:7 152:14 190:8	<b>surprise</b> 192:8		<b>talk</b> 14:8,24 16:10,14 34:9 34:13 35:15 37:25 42:9 57:3 69:7 71:18 72:13 73:8 80:11 89:20 97:8,11 113:18,20 121:25 130:15
<b>supposedly</b> 80:16	<b>surprised</b> 160:6		
<b>supreme</b> 201:15	<b>surrounding</b> 268:13		
<b>sure</b> 14:22 28:2 31:5 34:12 46:20 49:25 51:13 54:16 63:24 65:17,24 68:25 75:5 79:4 86:9 88:19 91:13,15 93:9,17 110:7 116:17 118:23 125:16 140:17 142:25 157:12 168:9 170:15 183:4 186:20 187:23 196:21 197:3 198:6 199:14 211:9 222:10 229:11	<b>surveillance</b> 268:13,15 269:4 <b>survey</b> 41:15 135:14 254:6 <b>surveys</b> 208:19 <b>susceptible</b> 190:22 <b>suspected</b> 261:22 262:9 <b>suspend</b> 249:25 <b>suspended</b> 251:9 <b>suspending</b> 251:13 <b>swear</b> 8:22 <b>switch</b> 26:21 <b>switching</b> 108:16	<b>t</b> <b>t</b> 2:16 3:9 295:2 295:2 297:3 <b>tab</b> 3:12,15,18 3:22 4:3,9,13 4:16,20 5:3,6 <b>table</b> 194:14	

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[talk - terrorism]

Page 66

131:10 136:22	<b>talking</b> 23:3	126:3,9	<b>temporal</b>
160:11 168:15	31:19 58:21	<b>teacher</b> 132:5	169:13,14
197:14 212:22	64:6 78:12	154:8	170:20
217:2,3 226:2	83:7 85:12	<b>teaching</b> 101:5	<b>temporarily</b>
226:3,4,9,25	86:21 134:8	109:18 126:14	250:23 266:8
231:6 232:22	140:6,6 144:4	127:23 211:11	<b>temporary</b>
237:14 243:7	158:20 160:21	<b>team</b> 52:14	254:9,10
243:10 247:9	163:19 164:5	<b>technical</b> 58:17	<b>ten</b> 23:10 32:10
260:16 262:11	166:25 169:9	197:7	217:18 286:18
266:20 275:13	194:7 212:23	<b>technique</b>	293:4,8
275:25 276:2	217:8 219:19	183:5	<b>tend</b> 219:16
289:15 290:24	230:3 231:23	<b>technologies</b>	258:6,25
290:25	233:17 243:21	1:6 2:12	263:18
<b>talked</b> 36:10	270:15 280:21	<b>technology</b>	<b>term</b> 61:20
49:8 51:20	<b>talks</b> 13:23	74:8 108:7	150:4 154:18
54:24 55:17	97:23 98:9	115:5 193:20	155:3 157:7,21
85:17 88:3	99:7,10,13	274:12	165:13 182:5
90:5 133:16	150:23 151:4	<b>teeth</b> 160:5	220:6 254:9
135:20 140:7	160:10 167:10	<b>telemetrics</b>	287:15
148:25 154:8	173:25 212:21	225:3	<b>terminal</b>
168:19 172:24	225:23 226:19	<b>tell</b> 33:19 90:13	124:16
179:4 180:12	235:4	161:10 176:20	<b>terminology</b>
182:7 199:12	<b>targeting</b> 44:23	179:21 216:17	150:10
199:14 203:20	<b>task</b> 212:3	216:25 223:21	<b>terms</b> 56:13
204:16 207:16	<b>taught</b> 135:8	224:17 254:3,3	62:8,23 87:8
207:18 210:22	<b>taxes</b> 223:10,13	254:4 273:6,11	101:11 125:9
212:18 236:18	<b>taxi</b> 115:7	295:9	127:17 140:2
243:5 245:22	117:5	<b>teller</b> 237:13	160:23 164:22
249:9,12 250:7	<b>taxis</b> 115:16	<b>telling</b> 83:3	170:21 216:8
250:17 251:8	116:4,9,24	117:8 178:25	221:21 260:10
272:10 274:19	117:11 118:14	179:11	260:12
279:6 287:17	<b>teach</b> 96:13,24	<b>tells</b> 74:18	<b>terrorism</b>
288:25 290:18	97:19,22,25	75:12	110:9
290:22	98:13 124:17		

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[terrorist - think]

Page 67

<b>terrorist</b> 110:9	<b>theme</b> 147:13	<b>theory</b> 101:16	149:23 178:15
<b>test</b> 102:22	<b>themes</b> 206:6	103:7 104:13	197:9 200:16
104:13,21	<b>theocratical</b>	104:13,15,19	207:10 214:6
105:3,24 186:8	204:12	105:4,11,25	246:14 253:25
<b>tested</b> 182:5	<b>theologizing</b>	106:22 111:16	259:16 263:5
185:24	13:23	130:21 134:21	278:20 286:13
<b>testified</b> 9:13	<b>theoretical</b>	138:6 181:13	289:5 293:10
35:7 55:8 56:2	102:23 108:13	181:20 182:15	<b>things</b> 12:24,25
56:5,9 87:10	134:3,24	182:24 183:5,8	38:24 52:19
<b>testifying</b> 10:3	135:20 186:25	183:17,20,21	82:15 87:7
56:21 58:12	199:19,21	183:22 185:11	89:20,25 99:11
<b>testimony</b> 4:9	203:19,21,23	185:16,20	105:24 108:3
17:8 35:10	206:14 227:6	186:23 187:2,3	116:8,19 119:6
55:17,21 57:4	234:16 235:3	187:6 188:13	131:5,9,11
57:12,19,24	239:22,25	189:2,3,8,9,10	134:16 148:23
58:20,25 59:19	240:10 270:18	189:14,15,20	155:5 175:12
60:13,15 77:15	289:23	189:22 190:13	177:6 187:24
83:8,11 85:13	<b>theoretically</b>	197:5,17	202:7,14
128:16 169:25	133:7,23,25	213:24 214:7	206:14 208:7
171:7,7 228:3	243:17 275:18	230:20 233:20	208:20 212:23
295:9,12	289:6,20	234:15,19	215:18 223:5
<b>testing</b> 102:14	<b>theories</b> 102:12	235:2,4,9	225:6 232:23
103:23 187:4	102:13,14	269:16,16	235:12 241:14
259:21	103:13,20	272:14 275:25	243:13 246:12
<b>tests</b> 14:5 259:4	104:3 106:13	276:15 281:22	247:5 273:7,9
<b>text</b> 22:14	106:23 185:23	287:23	278:25 287:16
<b>texts</b> 53:16	190:7 216:18	<b>thereof</b> 295:13	293:10
<b>textual</b> 213:21	<b>theorists</b> 184:7	<b>thereto</b> 39:9	<b>think</b> 12:19
<b>thank</b> 29:22	<b>theorize</b> 164:19	<b>thing</b> 51:22	13:10,21 14:7
91:5 94:2,6	165:9 166:2	60:16 63:19	15:10 26:8
218:8 294:4	293:17	73:9 86:22	28:17 29:3,6
<b>thanks</b> 12:21	<b>theorizing</b>	99:12 115:18	29:14 33:23
146:15	92:11 135:24	116:12 123:20	40:5,7,8 48:11
		124:9 127:22	54:22,24 55:14

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[think - three]

Page 68

57:16,21 58:6	143:4 145:2,16	230:19 232:7	284:8 288:17
58:7,15 59:18	146:23 147:5	232:13,21	288:24 289:10
60:8 61:14,19	147:22 151:2	233:4 235:8	<b>third</b> 111:15
61:20,23,25	151:17,25	236:22 237:5	115:9 240:21
62:15,22,23	153:21 155:17	238:13 241:16	<b>thirds</b> 254:7,20
63:19 64:19	160:16,24	242:24 243:5	255:3,9
65:4,8,13 68:4	164:12,20,22	244:25 245:3	<b>thirty</b> 296:16
68:10 69:19,19	166:14 168:10	249:13 251:4	<b>thoroughly</b>
72:24 79:20	168:15 170:5	251:21 252:2,6	40:6
80:2 81:11,19	170:12,17	252:12 254:14	<b>thou</b> 49:21
81:22,23 82:7	171:4 172:25	255:6,16,21,24	<b>thought</b> 8:25
82:14 83:15	173:6,24 175:9	256:25 257:5	15:16 52:15,20
86:21,21 87:4	175:11,21	258:5,6 260:2	80:8 107:4
87:21,23,25	178:6,14,15,16	260:15,21	130:13 153:2
89:19 90:5	180:22,25	261:3 263:5,18	192:8 194:5
92:9 95:25	181:4,11	264:9,23	196:24 219:22
101:24 102:8	182:14,24	265:21 267:19	252:9 280:20
102:19 104:5	191:18,23,25	270:25 271:4	284:13 285:5
105:2,9,13	192:3 193:7,19	275:4,13	289:21
106:9,22 107:6	193:21,23	278:11 279:4	<b>thoughtful</b>
109:8,15 110:3	195:14 197:2,9	279:25,25	219:20
110:4,24	197:13,14	282:3 285:16	<b>thoughts</b>
112:24 113:7,8	198:13,18	286:3 293:9	155:18 285:13
113:14 116:16	199:13 200:21	<b>thinking</b> 23:12	<b>thousands</b>
117:11,18	202:19 203:7	24:13 34:8	42:22
118:3,13 119:4	207:2 208:21	54:2 63:18	<b>threat</b> 66:18
119:11 121:21	209:8 211:10	109:13 134:13	67:16,18 181:7
128:23,24	212:8 213:7,8	137:7 145:7	<b>threaten</b> 48:4
129:21,22	214:10 215:3,3	153:7 154:4	<b>threats</b> 181:6
130:16,20	216:12 217:10	190:6 192:15	<b>three</b> 36:22
131:9,12,25	217:14 219:25	211:15 215:7	48:12 87:18
134:15 135:2	220:13 225:15	216:19 226:18	203:5,10 206:2
136:13 138:10	227:11,24	230:19 232:8	206:6 212:6
138:18 141:20	228:8 229:5,13	233:23 234:23	

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

**[threshold - triangulation]**

Page 69

<b>threshold</b> 200:11	<b>timing</b> 170:21 172:19,20	<b>topics</b> 88:12,21 89:5,11,16	49:7 296:17,18
<b>threw</b> 152:18	<b>title</b> 24:21 25:3	95:7 96:17	<b>transcription</b> 295:11 298:6
<b>tighter</b> 140:12	157:4,5 247:7	99:14	<b>transcriptions</b> 41:14 50:18
<b>time</b> 7:22 10:24 11:8 20:20 21:14 23:10,13 23:18 29:18 35:19 36:13 47:7 61:7 66:9 68:16 71:3 75:3 80:2 84:3 84:9 88:17 93:12 109:12 110:13 118:21 141:13 144:17 150:21 154:7 154:23 155:18 156:4 157:15 158:9,15 168:18 187:22 188:23 196:6 202:3 204:17 216:9 217:12 217:21 218:3 225:6 265:25 277:13 291:13 291:20 294:4,9 295:8	253:17 <b>titled</b> 24:18 25:3,25 118:24 <b>today</b> 9:4 10:3 12:12 17:8,21 26:7 117:23 199:13 201:7 250:12 <b>today's</b> 18:13 230:11 <b>together</b> 53:9 233:24 244:19 <b>told</b> 40:17 <b>took</b> 11:3 80:14 84:5 110:4,4 158:11 217:23 262:9 291:15 <b>tool</b> 242:7 <b>tools</b> 238:17 269:4 <b>top</b> 80:22 102:2 102:5 146:21 169:5 174:4 178:17 206:5 207:7 236:18 254:24 <b>topic</b> 127:18 156:8 195:5 288:2	<b>totally</b> 54:21 82:22 123:9 189:5 <b>touch</b> 89:18 <b>touching</b> 80:3 <b>toward</b> 143:16 204:8 205:25 278:24 <b>towards</b> 228:15 <b>trace</b> 134:12 <b>track</b> 36:16 38:6 41:7,12 246:14 <b>trackers</b> 245:17 <b>tracking</b> 245:25 247:23 248:5 249:3 <b>tracks</b> 32:6 <b>traditional</b> 71:25 171:19 <b>trained</b> 209:19 <b>training</b> 41:20 93:16 <b>tranche</b> 204:2 <b>transcribed</b> 295:10 <b>transcribing</b> 61:8 <b>transcript</b> 43:2 45:22 48:17,21	<b>transfer</b> 146:8 <b>transferability</b> 139:21 <b>transferable</b> 140:8 <b>transition</b> 180:11 <b>translate</b> 147:4 <b>translation</b> 147:22 <b>transparent</b> 229:21 <b>transportation</b> 220:18 <b>travel</b> 116:21 <b>treatises</b> 53:17 <b>tree</b> 223:25 <b>trees</b> 223:20 <b>trial</b> 7:22 12:16 15:21 53:18,20 135:16 <b>triangulation</b> 147:7,9,10,23 191:6 201:7,9 201:22 202:6 202:11,12,17



## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[tricky - uber]

Page 70

<b>tricky</b> 72:19 89:4 257:2 <b>triggers</b> 215:21 <b>trip</b> 174:2 197:3 <b>trouble</b> 81:16 <b>true</b> 57:15 72:8 80:17 89:22 93:10 112:10 163:20 164:8 168:10,13,14 169:3 172:25 173:7 234:21 259:25,25 260:18 263:4 267:7,10 295:11 <b>truth</b> 295:9,9,9 <b>truthful</b> 17:8 <b>try</b> 16:9,13,14 16:19 49:3 68:20 69:21 129:25 134:4 141:23 155:20 161:9 165:4 236:6,8 242:2 248:24 275:19 285:11 <b>trying</b> 38:4,6 44:10,21 46:11 65:12 89:3 101:24 102:25 110:3 138:5 140:11 157:13	164:19 166:2 166:18 168:22 193:10 200:19 201:18 211:9 212:17 213:15 220:7 234:18 247:6,8 255:24 257:2 279:18 281:9 284:24 290:2 <b>turn</b> 154:17 155:3 188:22 231:15 <b>turning</b> 131:14 <b>turnover</b> 231:16 <b>tuskegee</b> 43:15 <b>twice</b> 77:14 165:16 <b>two</b> 13:2,5,7 14:10 15:14 18:4 29:10 30:4 31:14 36:2,6,21 40:2 62:24 76:15 83:9 85:17 86:24 87:18 125:6 126:14 135:9 140:23 156:9,21,23 164:9 165:5 172:4 177:20 178:23 179:7 179:21,22	183:19 186:4,4 188:17 193:17 200:10 202:7 231:11 233:24 235:3 237:4 239:4,11 254:7 254:20 255:3,9 283:4,5,24 285:10 <b>type</b> 43:9 49:13 77:19 108:14 117:14 127:13 134:11 141:9 149:5 182:21 183:2,3 193:9 202:24 203:2 224:2 266:25 274:21 <b>types</b> 71:11 98:11 177:21 193:16 195:10 232:23 236:13 236:16 237:7 <b>typo</b> 29:11,22 34:2 <b>u</b> <b>u</b> 107:21 <b>u.s.</b> 110:16 211:7,13 213:25 <b>uber</b> 1:6 2:12 8:10 9:8,9 13:25 14:2,24	23:10 34:10 40:18 44:22 55:10 61:20 78:12,17,20,23 80:8 85:25 86:3,13 87:10 87:15 88:21 90:10 91:23 92:6,13,18 93:11 97:12 107:18 111:19 118:9,14 122:2 150:6,17,22 151:5 163:12 163:12,21 169:3 173:8 175:18 193:20 195:18,24 197:10,11 201:23 202:22 204:17 215:4 218:23,25 219:3,7,11,16 219:18,25,25 220:17,23,24 221:4 222:3,13 223:21,22 225:19,22 226:8,9 227:2 227:8,18 228:3 229:17 230:24 232:23 236:12 237:15,20 238:9,16,19
--	--	---	--

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[uber - use]

Page 71

239:23 241:5,8	<b>unclear</b> 165:7	69:23 110:22	<b>universe</b> 56:3
241:8 242:12	<b>uncomfortable</b>	115:14,25	<b>university</b> 50:3
242:18 243:11	188:23	118:5 128:25	96:9 97:16
245:5 247:18	<b>under</b> 10:3	149:25 150:8	<b>unobservable</b>
249:16 254:13	28:4,8 94:5	151:18 152:20	260:24 261:9
255:23 256:17	123:12 167:11	153:17,23,25	<b>unpleasant</b>
258:8 259:15	175:19 295:11	159:8,16,23	228:24
261:16 262:3,8	<b>undergrad</b>	160:2,15,25	<b>unpredictable</b>
262:21 263:15	110:3,6,19	180:5 189:8	230:6 244:9
263:17 264:13	<b>undergraduate</b>	220:10 294:11	<b>unsubstantiat...</b>
264:14 268:19	108:19 109:24	<b>understandings</b>	78:6,14 79:22
269:12,17	<b>underlining</b>	178:24	81:5
273:8 276:4,7	219:17	<b>understands</b>	<b>unusual</b> 109:7
281:23 282:22	<b>underneath</b>	182:9	<b>updated</b> 27:20
283:5,11	241:9 270:17	<b>understood</b>	28:19 29:15
286:18 287:14	<b>understand</b>	10:10 16:23	31:25
287:14 288:13	10:2 14:13	24:17 62:5	<b>updating</b> 24:10
292:4,22 293:2	17:4 38:17	90:7 91:13,16	<b>upsell</b> 265:25
<b>uber's</b> 223:14	44:11 46:6	282:18	<b>upset</b> 261:23
251:13 254:22	56:14 58:15	<b>unequivocal</b>	262:6
258:9 276:3	60:12 65:12	167:25	<b>upsetting</b> 83:16
283:16	69:8,25 74:12	<b>unfair</b> 251:22	<b>upwork</b> 212:4
<b>uber's</b> 253:18	89:4,9 105:9	252:4	263:13 264:13
<b>uc</b> 107:19	136:13 145:11	<b>unfairly</b> 78:4	264:14
<b>uh</b> 16:8,8,8	150:4 155:21	78:22	<b>usage</b> 241:2
29:12 142:22	166:4 176:16	<b>unfold</b> 136:8	283:10
143:7 144:19	178:11 184:14	<b>unique</b> 265:2	<b>use</b> 18:13 44:14
174:11 284:21	187:6 188:14	<b>uniquely</b>	53:18,20 61:18
<b>uk</b> 213:25	189:7 202:10	265:16	63:17,20,24
<b>ultimately</b>	213:15 220:13	<b>unit</b> 8:7 24:4	64:13,19 65:7
278:2	234:18 240:11	84:10 158:17	73:13,14 74:21
<b>unaware</b>	281:10	218:5	100:8 102:24
249:19 260:17	<b>understanding</b>	<b>united</b> 1:2 8:11	130:21 136:22
	43:12 51:14	113:2,8 243:2	138:9 143:21

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[use - view]

Page 72

147:6 151:12 155:3 157:21 161:2,5 165:12 166:6 174:18 174:19 175:23 183:4,8 190:24 213:23 221:21 234:22 261:16 261:17 262:24 265:4 269:3,13 269:18 270:2 271:17 <b>used</b> 33:25 111:19 130:25 150:5 151:5 155:9 160:2 165:16 177:22 188:15 197:10 197:11 198:8 213:4 214:2 220:6 221:19 234:16 248:6 268:16 269:8 296:19 <b>uses</b> 14:24 15:2 148:12 154:18 157:6 165:5 169:12 254:8 282:22 <b>using</b> 74:10 100:4 101:19 108:15 125:9 127:7 129:21 130:2 150:19	154:6,9 155:7 163:24 164:2,8 174:17 210:13 214:7 259:11 259:18 <b>usually</b> 143:2 207:2 <b>utilize</b> 222:13 <b>utilized</b> 52:24 242:12 <b>v</b> <b>v</b> 218:11 <b>vague</b> 134:8 <b>valid</b> 46:2 <b>validate</b> 104:3 <b>validity</b> 131:18 148:24 185:20 192:14 255:19 <b>valuable</b> 195:25 <b>value</b> 75:22 228:16 230:19 247:4 259:17 293:13 <b>valued</b> 102:13 <b>values</b> 103:17 242:5,11 <b>vanderbrand</b> 138:24 <b>variability</b> 184:12 <b>variables</b> 108:3 108:6 243:7	<b>variance</b> 135:19 200:3 201:4 <b>various</b> 76:17 <b>veena</b> 107:13 108:14 118:13 242:14 <b>vegetables</b> 271:22 <b>vehicle</b> 116:20 116:21 <b>vehicles</b> 115:8 246:5 <b>veins</b> 235:3 <b>vendor</b> 115:9 <b>veneer</b> 152:5,8 152:19 <b>verbal</b> 16:7 <b>verification</b> 65:16 66:3,4 66:12 68:4,12 69:9 187:4 189:10 245:23 <b>verified</b> 185:25 186:8 <b>verify</b> 68:21 69:4 <b>verifying</b> 189:15 245:20 <b>veritext</b> 1:21 8:15,17 <b>versa</b> 237:10 <b>version</b> 11:24 12:2 29:17	119:19 143:2,6 194:5 233:14 <b>versions</b> 45:12 48:5 228:6 <b>versus</b> 24:2 41:4 86:20 87:5 94:14 101:20 113:24 117:11 135:11 136:3 138:12 156:8 178:18 180:13 200:3 264:19 285:2 <b>vested</b> 276:9 <b>vetchky</b> 208:2 <b>vice</b> 237:10 <b>video</b> 8:8 10:24 11:7 50:19 84:3,9 158:9 158:15 217:21 218:3 291:13 291:19 294:9 <b>videographer</b> 2:18 8:3,16 10:23 11:6 84:2,8 158:8 158:14 217:20 218:2 291:12 291:18 294:8 <b>videos</b> 266:24 <b>videotaped</b> 26:2 30:25 <b>view</b> 70:16 102:16 118:16
---	---	--	---

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[view - window]

Page 73

118:25 154:16 162:4 176:10 177:7 190:8 218:24 219:11 220:17,20 244:21 278:19 293:10 <b>viewpoints</b> 247:9 <b>violations</b> 198:14 252:13 <b>virtual</b> 22:23 <b>virtually</b> 91:20 <b>virtues</b> 170:2 <b>visual</b> 210:21 <b>vitae</b> 26:25 <b>voice</b> 49:5 <b>volume</b> 108:12 243:6,10 <b>vote</b> 101:4	91:2,12,15 96:2 109:15 123:2 136:14 142:24 143:8 160:20 166:17 170:12,15 171:18 178:14 184:13 187:21 195:13 199:17 202:25 215:21 217:17 228:2 230:4 250:22 261:12 264:6,7 264:20 267:8 277:4 292:5 <b>wanted</b> 51:13 118:13 193:13 <b>wants</b> 152:6 <b>washington</b> 2:10 41:21 131:24 <b>water</b> 74:6 <b>way</b> 15:2 27:8 28:6 42:21 46:15 48:10,18 49:6 51:9 55:15 61:18 65:4 68:21 69:10 72:25 79:11 82:15 83:17 93:25 96:2 104:5,10 113:17,20 129:21 131:10	132:11 145:9 145:19 148:7 152:2 160:3,4 160:10,11,14 164:11 165:8 174:17 176:5 182:14 184:7 188:14,18,19 188:20 189:20 189:25 190:12 190:14 191:7 191:11,12 192:15,15,25 214:10 217:6 224:20 226:22 229:22 236:8 239:20 242:19 248:20 252:7 257:10 260:14 261:19 270:8 271:21 273:19 274:13 275:2 275:15 286:16 286:22 <b>ways</b> 14:18 63:12 68:10 113:15 126:8 164:9 165:6,9 172:22 189:21 206:23 210:24 219:25 225:2 248:5,8,11 256:4 260:24 261:8,18,25	<b>we've</b> 83:7,8 99:14 144:4 156:2 199:12 212:18,23 219:18 250:11 <b>weak</b> 125:20,23 <b>wear</b> 65:19 <b>web</b> 293:3 <b>website</b> 28:20 29:16 30:4 57:13,17 59:25 60:2,8,10,20 <b>wednesday</b> 1:16 8:5 <b>weeks</b> 15:14 204:3 <b>weighing</b> 247:3 <b>welcome</b> 11:10 84:12 158:19 218:7 <b>weng</b> 185:4 <b>went</b> 24:13 68:19 94:4 160:18 204:6 216:14 274:18 <b>west</b> 180:25 <b>wharton</b> 96:8 <b>whitman</b> 203:8 <b>wide</b> 101:4 <b>widely</b> 150:5 <b>widen</b> 195:25 <b>wild</b> 180:24 <b>window</b> 23:13
<b>w</b>			
<b>wage</b> 242:21 <b>wait</b> 163:20 204:24 <b>waitlisting</b> 254:10 <b>waive</b> 7:13 <b>waiver</b> 43:18 <b>want</b> 10:18 13:4 40:4 52:6 54:12 61:17 71:24 72:9 86:23 89:4			

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[winning - work]

Page 74

<b>winning</b> 105:18	166:12 167:20	<b>won</b> 114:3	161:2 179:12
<b>witness</b> 6:4	169:22 170:5	136:24 138:19	270:18
8:22 10:14,18	173:10 175:8	<b>wondered</b>	<b>work</b> 12:24
21:25 22:9	178:2 179:4	251:5	20:4,5 21:21
25:9 26:12	180:10 181:18	<b>wondering</b>	22:6,17 23:22
29:21 33:22	182:7,18 186:3	118:25	25:9 33:15,24
40:24 42:16	186:11 187:8	<b>woods</b> 2:16	34:13,14 41:20
43:11 45:14,21	187:11,19,21	<b>word</b> 63:20,20	49:8 61:2,15
46:20 47:7	189:12 190:24	63:25,25 64:15	62:3 63:8,13
48:8,24 49:24	193:7 195:3	64:19 67:4	70:5,11,17,24
56:8,14 61:11	196:16 202:2	109:2 138:14	71:11 72:11,12
62:12 64:18	202:24 217:15	147:6,12	75:22 77:9
65:7 68:7,15	217:19 220:20	148:12 150:19	78:5 79:22
68:25 72:18	221:3,17 223:2	151:13,25	87:8 92:12
73:16,21 75:2	224:23 229:19	154:10 155:7	96:13,23,25
75:17 79:14	233:22 235:17	155:10 159:4	105:22 107:9
81:8 82:13	238:5 244:16	160:3 163:24	107:12,14
83:24 88:16,25	246:17 248:4	164:2,8 165:5	108:5 110:23
90:18 94:6	248:16,24	165:16 169:11	110:24 112:8
95:10 102:18	251:25 252:17	169:12 190:25	128:11 130:9
103:16 104:8	253:2 255:6	192:18 221:18	136:6 137:14
104:12 106:18	256:25 258:2	228:23,25	146:23 148:20
107:4 111:25	261:14 269:21	229:4 234:22	148:20 155:11
115:18 118:20	271:14 275:4	256:19,20	157:24 160:18
119:4,16,25	275:22 277:16	259:17,22	160:21 161:2
120:9 122:23	278:11 279:23	263:10,11	164:22,24
124:2,25 126:7	281:4 284:8	292:20	174:8,21 192:6
128:6 129:4,24	288:17 294:6	<b>worded</b> 66:24	195:18 199:16
131:3 132:21	295:12,14	68:18	202:20 204:21
136:20 137:6	296:2	<b>wording</b>	222:19 227:7
138:2 141:20	<b>witnesses</b> 16:16	153:22	235:10,12
150:13 151:22	<b>women</b> 80:3	<b>words</b> 61:18	238:18 240:20
153:21 154:22	<b>women's</b> 33:15	64:13 65:8	242:14,16
158:7 162:10		138:10 147:2	244:23 256:11

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[work - wyatt]

Page 75

256:17 257:17	173:5 174:20	276:2,14,20	<b>written</b> 11:22
257:21,24	176:11 196:2	277:9	46:23 60:15,19
258:13,16	199:7 218:18	<b>works</b> 16:7	116:5 117:10
262:12 263:20	219:8 221:22	60:13 104:19	117:14 118:14
264:18 273:21	228:15 235:13	156:10 222:20	124:19 150:25
273:23,23,25	237:7,9 239:16	225:20 256:5	157:9 167:13
273:25 275:2	242:20,21	281:23 282:2	177:16 236:7
279:7,10,20	244:8 245:18	<b>world</b> 113:6	241:20 244:19
280:9 285:2	246:5 249:19	240:19	255:22 262:23
286:14 287:7	251:18 256:7	<b>worlds</b> 109:19	264:21 286:17
287:13 290:12	256:10,17	<b>wow</b> 233:22	286:22 287:11
290:21	258:20 259:12	<b>write</b> 70:10,21	<b>wrong</b> 61:13
<b>worked</b> 21:16	260:4,11,16	99:7 115:2	66:25 76:7
21:17 55:5	262:15 263:12	119:20 124:11	80:14,14 91:10
110:16 152:24	266:16 268:20	139:16 144:24	130:22 149:23
153:10 159:21	270:5,10,22	148:19,21	150:11,14
206:12 209:13	271:6 273:23	149:10 159:3	179:24 251:22
<b>worker</b> 87:25	274:3,5,9,13,25	169:10 192:5	252:4 263:6
144:7 199:6	276:9 278:4	199:4 213:22	<b>wrote</b> 22:14
245:20 265:6	282:24 284:12	216:11 231:10	71:13 127:10
265:11 270:9	293:12	245:11 256:6	233:15 236:24
275:2,11,20	<b>workforce</b>	259:2 260:21	264:12
276:22 277:11	60:25	264:25 273:19	<b>wyatt</b> 2:9 3:6
277:12	<b>working</b> 20:21	286:24	9:6,6,17 10:20
<b>worker's</b>	61:3 132:2	<b>writer</b> 179:11	11:9,18 18:24
161:21	133:12 154:9	<b>writes</b> 203:10	22:4,10 25:11
<b>workers</b> 61:23	160:7 180:4	<b>writing</b> 24:7,13	25:13,21 26:15
61:25 66:18,20	204:21 240:4	43:2 153:14	27:6,14 29:24
67:17 70:6,12	255:23 273:7	157:15 211:16	30:7,11,19
70:18 74:5	287:14	214:17 215:15	33:4 34:15
83:16 87:24	<b>workplace</b>	216:10 229:3	38:3,8,9 40:22
115:24 122:3	137:8,8,12	232:8 249:13	41:6,9,10 43:4
139:5 165:21	140:7,8 145:20	<b>writings</b> 38:12	44:9 45:6,9,17
169:14 172:20	145:22 275:14	79:3 249:7	46:4,21 48:3

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

[wyatt - ö]

Page 76

48:20 49:15	158:4,18	289:25 291:7	291:5 294:6,14
50:4 54:10,14	162:12,14,21	294:3,14	<b>year</b> 21:11 99:4
54:17 56:17	162:24 164:15	<b>x</b>	111:13,15
59:4,11,13	167:5 168:5	<b>x</b> 3:2,9 134:7,7	<b>years</b> 23:11
61:12 62:14	169:23 170:9	134:14,15,17	32:10 35:4
65:2,10 68:9	173:13,17,19	134:20 192:9	109:11 152:13
68:17 69:18	175:3,13	257:11	152:25 159:22
73:11,18,23	177:14 178:4	<b>y</b>	203:6,10
75:4,19 79:16	179:25 180:20	<b>y</b> 192:10	229:24 230:9
82:5,17 83:22	182:2,11,23	<b>yeah</b> 10:12,14	259:4 285:19
83:25 84:11	184:22 186:5	10:16 28:10,19	286:18 292:25
85:2 88:18	186:18 187:14	29:12 31:6	293:4,8
89:2 90:22	189:4,17	41:2,6 49:24	<b>yep</b> 194:11
91:6 93:24	191:15 193:11	50:11 54:14	198:25 270:6
94:8 95:15,19	195:19 196:20	58:16 67:15	<b>yeses</b> 16:8
98:21 103:10	202:4 203:16	71:17 86:21	<b>yesterday</b>
103:25 104:9	217:10,17	114:20 116:15	28:17 30:4
105:7 106:12	218:6 219:13	141:14 153:4	135:9
106:20 107:8	220:22 221:12	154:5 155:16	<b>york</b> 98:24
112:4 114:8,17	221:23 223:7	157:18 158:4	237:24
116:6 118:22	223:17 224:24	161:9 163:5	<b>youtube</b> 266:24
119:10,18	230:21 233:25	182:12 197:9	<b>z</b>
120:3,23	235:23 238:11	201:20 211:10	<b>zones</b> 256:8
121:12 123:8	244:24 246:19	211:18 216:18	<b>zoom</b> 1:15
124:4 125:21	248:7,18 249:5	217:15 220:25	<b>ö</b>
127:5 128:13	252:11,19	221:4 228:22	<b>ö</b> 193:17
129:6 130:4	253:4 255:11	232:3,21,24	
131:7 132:25	257:14 258:17	235:7,12 245:6	
136:25 137:22	262:4 269:23	249:15 257:21	
139:10 141:22	271:24 275:6	263:4 279:12	
142:3,10,12	277:6 278:5,17	280:18 284:15	
151:15 152:22	280:14 281:7	288:4,8 289:24	
154:15,24	282:9,13,16,20	290:13,20	
156:6,17,19	282:21 284:16		

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.



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Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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